



AIR & WASTE MANAGEMENT
ASSOCIATION

SINCE 1907

West Michigan Chapter
Chartered 1993

WEST MICHIGAN ENVIRONET

A Newsletter of the West Michigan Chapter of the Air and Waste Management Association

Volume No. 9 Issue No. 2

Fall 2001

TITLE V COMPLIANCE CERTIFICATION

*By Heidi Hollenbach, District Supervisor
MDEQ, Air Quality Division*

Title V of the Clean Air Act requires major sources of air pollution to obtain a Renewable Operating Permit (ROP). The Michigan Department of Environmental Quality, Air Quality Division (AQD), is responsible for issuance of these permits. A source with a ROP must comply with certain deviation reporting and compliance certification requirements. These requirements are contained in the ROP general conditions.

A source must “promptly” report any deviations to a permit condition. Promptly means deviations that trigger reporting under Rule 912 must be reported in accordance with the rule. For all other deviations, promptly means reporting in the Semi-Annual Report.

Every six months, or more frequently if required by the ROP, a source must certify that all monitoring and associated recordkeeping requirements have been met. A source must also report any deviations from all permit conditions at this time. The Semi-Annual Report Certifications are due for most sources on March 15 for the reporting period July 1 – December 31 and on September 15 for the reporting period January 1 – June 30.

On an annual basis, a source must certify whether or not the facility was in compliance with each and every term and condition of the ROP for the previous year. All deviations from the year must

be reported, even if previously reported in a semi-annual report. The Annual Compliance Certification is due on March 15 for the previous year. A copy of the Annual Certification must be sent to EPA at the address noted in General Condition 28.

Other reporting may be required by a ROP. This reporting could include requirements of a National Emission Standard for Hazardous Air Pollutants (NESHAP), stack testing, or a Continuous Emission Monitoring System (CEMS).

All the above reports must be certified by a Responsible Official. In general, a responsible official is an officer in charge of a principal business function of the company. The officer may appoint an authorized representative in some instances. An original signature is required on the form submitted to the AQD.

Sources should know and understand their permit requirements and spend the necessary time to properly review and certify compliance. It is better for a source to report deviations than to falsify compliance. Not all deviations will be considered violations, but failure to properly report will likely result in enforcement action by the AQD.

Inside This Issue

- 1** *Title V Compliance Certification*
- 2** *Proposed Part 201 Rules*
- 3** *Leather Company Creates Alternative to Landfilling*
- 4** *Iron and Steel Foundry MACT*
- 6** *Revised Part 5 Rules*

Some common errors in completing the required reporting forms include incorrect or incomplete reporting period dates, improper responsible official signature, signature not original, and proper boxes not checked. Reports should be submitted by their due date.

To better understand a source's reporting requirements, the Environmental Assistance Division is offering training sessions in November and December on "Life After ROP: Renewable Operation Permit Reporting and Modification." For more information, contact EAD at 1-800-662-9278 or register on-line at www.deq.state.mi.us/ead.

PROPOSED PART 201 RULES

*By John Byl, Partner
Warner, Norcross & Judd, LLP*

Introduction

The 1995 amendments to Part 201 substantially modified Michigan's cleanup criteria. The new cleanup criteria are land use-based criteria--residential, commercial, industrial and recreational. To date, those cleanup criteria and certain other aspects of Part 201 have generally been implemented based on policy from the Michigan Department of Environmental Quality (MDEQ). Over the past couple of years, the MDEQ has worked on rules to implement the cleanup criteria and other parts of Part 201. This Part 201 rules package, approximately 300 pages in length, was published for public comment in late June, 2001. With a few notable exceptions, the cleanup criteria in the proposed Part 201 rules codify the criteria already used based on MDEQ policy. The public comment period expired on September 11. The MDEQ received substantial comments on the proposed rules. Several concerns emerged from the comments.

Controversial Issues

1. **Groundwater Surface Water Interface (GSI) Criteria.** Contaminated groundwater that enters a surface water body, such as a river or lake, must meet groundwater surface water interface (GSI) criteria at the point of entering the surface

water body. The purpose of satisfying the GSI criteria at the interface is to protect aquatic life. Currently, a party implementing a cleanup would measure the concentration of contaminants in the groundwater as close as possible to the surface water body. Under the draft rules, the point of compliance is not at the interface, but at a point in the groundwater above the "ordinary high water mark." This phrase is undefined and, in some cases (especially when the water table is lower than normal), is expected to result in testing as far as a quarter mile inland from the surface water body.

A second GSI issue in the draft rules is a requirement that groundwater be evaluated at storm and sanitary sewers, and that certain actions be undertaken if concentrations exceed GSI criteria at the sewers. Under the proposed rules, there is an assumption that groundwater infiltrates sewers unless a showing can be made to the contrary.

2. **Achieving Finality.** Some commenters believe the rules include too many requirements to achieve a final remedy, or "remedial action plan". Various rules include provisions for continuing obligations and reopeners that arguably place additional uncertainty in the process and add new issues that require evaluation and result in increased cost.

3. **Self Implementation.** Some of the provisions in the rules impose restrictions on voluntary cleanups. These restrictions make it more difficult for liable parties to achieve the self implementation that was promoted in the 1995 amendments to Part 201. Under the rules, MDEQ approval is required for various aspects of the cleanup. There is a concern among the regulated community that such restrictions will add cost and time to remediation efforts.

Status

Because of the significant controversy over certain aspects of the proposed rules package, the Director of the MDEQ has appointed a special committee to review and modify the rules. The group is meeting regularly and hopes to have a revised draft of the rules available for public comment by January, 2002. Because substantial

modifications are expected, the revised rules will likely be subject to another public comment period and public hearing.

LEATHER COMPANY CREATES ALTERNATIVE TO LANDFILLING*

*By John McDonnell
Eagle Ottawa, LLC*

To achieve its goal of finding a landfill alternative through beneficial use for its tannery residuals, the Eagle Ottawa Leather Company of Grand Haven, Michigan constructed a wastewater treatment plant and composting facility in the fall of 1993. All process wastewater used by the tannery to make finished automotive upholstery leather from raw hides is treated at the plant. The system is designed to treat 1.2 million gallons per day of processed wastewater along with approximately 90 percent of the storm water that falls on the 14-acre site. Removal efficiency of the treatment system average 99 percent total suspended solids and 98 percent biochemical oxygen demand. The consistent removal efficiencies of the treatment system allows the tannery to reuse a portion of its treated wastewater in the first stage of the process, thereby relieving the demand for river water usage.

Producing fine grade leather generates a large amount of waste as well as by-products. In order to produce 15 pounds of finished leather; 115 pounds of raw product and chemicals along with 250 gallons of water are required. The bottom splits from the hides are used for suede. Hide trimmings are sold for dog chews or gelatin. The remainder of the solids is removed at the treatment facility. Primary and secondary solids from the treatment system are blended, conditioned and then dewatered in a recessed plate and frame press. Dewatered filter cake with a solids range of 40-50 percent is dropped below each press into a 30-yard dump trailer. An average of 20 tons of filter cake is produced each day.

TRUCKED TO COMPOST SITE

Filter cake is then trucked to Newaygo Farms, which is located 50 miles north of the tannery near Walkerville, Michigan. The filter cake is brought to our 50,000-ft.² composting building located on the

north half of the 1,250 acre farm. The semi backs the trailer inside near the end of the building, and the cake is dumped on the concrete floor. Straw is then mixed with the sludge cake as well as lime and black rock phosphate. The mixture is then stockpiled in the back of the building to cure.

When one of three 300-foot long windrows has finished its composting cycle, the compost (ReTurn®) is moved to the back storage half of the building to await spreading on our farm field. A mixture of filter cake and straw along with other amendments is then brought from the curing pile to the main floor and built into a windrow.

Windrows are monitored for temperature and moisture content and turned when needed. A windrow compost turner is used to mix and aerate the eight-foot tall piles. Fans mounted in the side of the building aid in reducing the moisture content of compost while shortening the composting cycle. Other amendments used in the composting process are ground wood chips (which come from the tannery's endless accumulation of pallets), discarded cherry cordials from a nearby chocolate covered cherry cordial maker and, this year, we will add cattle hair from the hide dehairing process. With the addition of the hair, Eagle Ottawa Leather Company will divert approximately 13,200 tons per year of compostable organic material to Newaygo Farms.

The current economic value that the company receives from operating the firm is limited due to the plentiful landfills in the area with low tipping fees coupled with the regulatory safeguards that we have incurred by being the first in the state to undertake such a project. Eagle Ottawa Leather understands the long-term environmental and economic payoff that an aggressive environmental program will bring.

PRODUCT QUALITY AND UTILIZATION

Finished compost runs approximately 60-70 percent solids with an overall volume reduction of about 70 percent. The nitrogen content runs two percent on a dry weight basis with ammonia averaging 1-2 percent. Phosphorus and potassium are present at 0.5 percent and 0.02 percent

Leather Company Creates Alternative to Landfilling

– continued from page 3

respectively. Calcium levels will be 8-10 percent. All metals fall below the EPA 503 exceptional quality standards for biosolids. Trivalent chrome, which had once existed as high as 4000 mg/Kg (dry weight basis), is averaging 466 mg/Kg. The reduction has been attributed to better chromium utilization and separation for treatment. The compost is applied by spreader truck at four tons per acre or less. The application of ReTurn® has helped improve the soil by adding beneficial microbes, which in turn improve the soil texture, water holding capacity and calcium levels. Corn production on the farm yielded 44 bushels per acre when the company first acquired the property. Corn production of 155 bushels per acre has since been reached on some farm sections. The compost is being examined for beneficial uses outside of row crops. Orchard farmers are beginning to realize the natural disease suppression that compost provides. Adding microbes back to the soil that are present in compost helps keep a balance among the microbial population, which helps control organisms such as predatory nematodes from attacking plant roots.

Operating a compost facility has provided many challenges in dealing with the state regulatory agencies and developing end uses for the product. I feel that none of those challenges are as great as the day to day operation of the composting project and farm operation. That is where the farm manager plays a key role in the system. Farm Manager Dave Gould, his brother Mike and Jerry Hart have faced the issues of compost blending and equipment operation and have conquered them. These men have used their knowledge of farming and equipment repair to create spreaders from used equipment and adapt machinery that was not designed for use in a heavy compost environment. As a result, over 13,000 tons of leather tannery residuals are composted and used to improve farm soils every year.

** This is the second in a series of articles concerning the beneficial reuse of spent materials produced by West Michigan industries*

IRON AND STEEL FOUNDRY MACT

*By Craig Schmeisser, Senior Client Services Manager
RMT, Inc. Columbus, Ohio Office*

Background

In 1990, former President Bush signed the Clean Air Act Amendments (CAAA). Since then, the EPA has been developing regulations to fulfill the requirements of these amendments. Potentially, the greatest impact of the CAAA on foundries will be the regulation of Hazardous Air Pollutants (HAPs) in Section 112. The CAAA identifies 188 HAPs that are subject to regulations.

Under Section 112 of the CAAA, EPA was directed to compile a list of all *major sources* of HAPs and to develop standards for each category. *Major sources* are defined as those that have the potential to emit more than 10 tons per year of a single HAP or 25 tons per year of multiple HAPs. On July 16, 1992, the EPA published a list of source categories, which includes iron and steel foundries.

Existing and New Source MACT 112(d)

The CAAA requires that emission standards be promulgated for all source categories and provides that these standards must reflect “the maximum degree of reduction in the emissions of HAPs...the Administrator, taking into consideration the cost of achieving such emission reduction, any non-air quality health and environmental impacts, and energy requirements, determines what is achievable for new or existing sources in the category or subcategory to which such emission standard applies.” The standards used to implement this requirement are generally referred to as MACT, Maximum Achievable Control Technology.

MACT standards regulate two types of sources: *existing* and *new*. To develop the MACT standard for each source, the EPA must determine the average emissions limitations for all categories.

- For *existing* sources: MACT standards are required to be at least as stringent as the average emissions limitations achieved by the top 12% of the existing categories with over 30 sources

and the top 5 of the existing categories with fewer than 30 sources.

- For *new* sources: MACT standards are required to be no less stringent than the emission control that is achieved in practice for the best controlled similar source.

In November 1992, to compose the Iron & Steel Foundry MACT, the EPA began to compile information about foundry operations, emissions, and current air pollution control systems. The initial information was gathered from over 650 facilities through a Screening Information Request (SIR), known as the “short form”. A more involved Information Collection Request (ICR), or the “long form”, was sent as a follow-up in January 1998.

During the 1990s, a national trade organization established a task force to assist the EPA in developing an appropriate MACT standard for the industry. The task force has continued to communicate and give recommendations to the EPA throughout the MACT development process.

Besides gathering information through surveys and task forces, the EPA has obtained additional emission and process information through foundry vendors, phone calls to individual foundries, and available industry literature.

MACT and the Foundry Industry

Iron and steel foundries were an identified *major source* of HAPs under Section 112 of the CAAA. After further consideration, U.S. EPA is considering deleting steel foundries from the list of source categories because available data indicates that there are no major HAP sources in the category.

To establish existing source MACT standards for the iron foundry industry, EPA is approaching the task by identifying discrete foundry operations, identify the best control technology in current use and then determining the standard for the source by using the average emissions achieved by the top 12% (or top 5 of the existing categories with fewer than 30 sources) using the best control technology identified.

Currently the proposed standard is to be published in the *Federal Register* in the July/August 2001 timeframe. At this time, the existing and new source MACT standards may include the following:

Metal Preheating

- Temperatures must be maintained at 800 degrees F or controlled by an afterburner.

Melting Operations

- Particulate matter emission limit of .005 gr/dscf for cupola, and electric induction and arc furnaces where emissions are currently captured. New melting operations must meet a particulate matter emission limit of .003 gr/dscf.
- Cupolas must have an afterburner that maintains 1300 degrees F.

Pouring, Cooling and Shakeout

- If emissions are currently captured, a particulate matter emission limit of .01 gr/dscf would apply. For demonstrating compliance with the emission limit, U.S. EPA is considering allowing a weighted average for pouring, cooling and shakeout, based on air exhaust rates.
- New pouring and cooling lines, using chemically bonding molds, must install thermal oxidation that maintains a combustion temperature of 1500 degrees F.

Core- and Mold-making

- No liquid or gaseous HAPs in coating operations.
- No methanol in furan warm box binders.
- Naphthalene depleted solvents for phenolic urethane binders.
- Outlet limit of 2 ppm TEA on phenolic urethane cold box operations.

Summary

On July 16, 1992, the EPA published a list of source categories, which included iron and steel foundries. MACT standards were to be promulgated for the iron and steel foundry categories by November 15, 2000, but to date a proposed rule has yet to be published in the *Federal Register*. This delay may have a negative impact on the ability of the industry to have constructive dialogue with regulators regarding the rule.

Given the possible impact of the MACT standards on the industry, foundries should begin the process of determining the applicability of the standards on their operation. If the standard is applicable, the possibility of avoiding the MACT standard by accepting emission limits should be explored. Finally for those facilities that cannot avoid the rule, an early applicability determination will allow time for proper capital equipment budgeting and planning.

REVISED PART 5 RULES - PRESENT NEW REQUIREMENTS FOR POLLUTION INCIDENT PREVENT PLANS

*By Judy Schaefer
MDEQ, Environmental Assistance Division*

Effective August 31, 2001, the Part 5 Spillage of Oil and Polluting Materials administrative rules promulgated pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), MCL 324.3101 *et seq.* have been revised. These rules are overseen by the DEQ Waste Management Division and Surface Water Quality Division. The previous rules were rescinded and new rules were promulgated to address pollution incident prevention plans (PIPPs), secondary containment, and release reporting requirements.

Following is a summary of the revised rule changes:

The Critical Materials Register is no longer referenced in the Part 5 polluting materials. The

current list of polluting materials is salt, oil, any chemical included in Rule 9 [R 324.2009], and any compound or product that contains one percent or more, by weight, of these materials (based on the material safety data sheet formulation information).

The new rules clarify the definition of oil and expands the definition of salt. Salt includes sodium chloride, potassium chloride, calcium chloride, magnesium chloride, and solutions or mixtures of these compounds in either solid or liquid form.

The new rules identify threshold management quantities (TMQs) for both indoor and outdoor use, storage, or other management areas. Exceeding these TMQs will determine if you must prepare a PIPP and have secondary containment. Previous rules did not have minimum volumes identified.

The new rules include descriptive conditions and threshold reporting quantities (RQs) for materials which if exceeded, or occur, requires spills or releases to be reported. Previous rules did not have minimum quantities identified.

The new rules include facility exemptions from certain requirements if they meet specified conditions or are subject to other identified regulations. Previous rules did not have exemptions listed.

The new rules require the PIPP to be kept at the facility and available for inspection. Within 30 days of completing the plan, the facility must notify that it is in full compliance with the Part 5 Rules to the DEQ, Waste Management Division District Office that oversees the area where the facility is located. In addition, the facility must notify the Local Emergency Planning Committee and Local Health Department that the plan has been completed and available upon request. The facility must submit a copy to the requesting agency within 30 days of receiving a request.

The new rules require the plans to be evaluated every three years or after any release that requires implementation of the plan. The plan must be updated whenever there are changes to personnel, processes, or procedures identified in the plan.

The facility must re-notify the DEQ and recertify compliance when the plans are updated.

The new rules clarify the definition of an on-land facility and exempts some types of facilities.

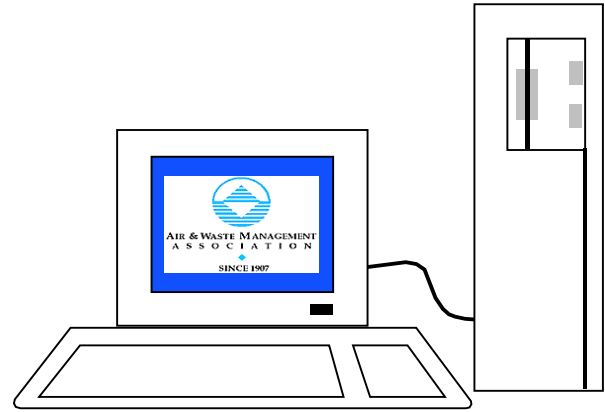
The new rules adopt the definition of release as per Part 201, Environmental Remediation, of Act 451 and includes specific exemptions.

The new rules provide clarification about secondary containment requirements. Required holding capacity is now consistent with the hazardous waste regulations.

Obtain the updated Part 5 rules for specific requirements. The rules can be viewed or downloaded from the [Internet at www.deq.state.mi.us/wmd/info&guide/index.html](http://www.deq.state.mi.us/wmd/info&guide/index.html). Printed copies of the Part 5 Rules can also be obtained by calling the Waste Management Division at 517-373-2730 or Environmental Assistance Center at 800-662-9278. The DEQ guidance document "Pollution Incident Prevention Plan (PIPP) Informational Packet" is currently being revised to reflect these changes and will be available www.deq.state.mi.us/ead/pub/tas/wmd/pippkt.pdf.

Call Judy Schaefer, Environmental Assistance Division at 800-662-9278 or 517-373-0590 for general questions about these new requirements, or your Waste Management Division District Office regarding general and technical questions pertaining to a specific facility.

**VISIT THE WEST MICHIGAN
CHAPTER'S WEBSITE AT:
[HTTP://WWW.WMAWMA.ORG](http://www.wmawma.org)**



We now have a PayPal account. You can use PayPal to pay for any of our conferences/services over the internet with your credit card.

West Michigan Chapter Committee Roster 2001 – 2002

Membership

Marc Groenleer – Chair
Ken Evans

Programs

Jim Enright – Chair
John Byl
Mark Horne
Dave Preston
Ken Evans
Sue Pemberton

Development

Ken Evans – Chair
Marc Groenleer

Nominating/Bylaws

Sue Pemberton – Chair

Newsletter

Dave Preston – Chair
Heidi Hollenbach

Scholarship

Jody Mastroeni – Chair
Ron Blouw
Sue Pemberton

Education – Outreach

Jill Koebbe – Chair
Janet Vail

Internet Coordinator

Cal Peters – Chair

Finance

Ron Blouw – Chair
Marc Groenleer

Long-Range Planning

Entire Board

Sections and Chapters Council

Marc Groenleer - Chair



Chapter News

CHAPTER CO-SPONSORS ROP PROGRAM

Michigan Department of Environmental Quality - Air Quality and Environmental Assistance Divisions are offering a seminar on ROP Compliance. The seminar: *LIFE AFTER ROP: RENEWABLE OPERATING PERMIT REPORTING AND MODIFICATIONS*, will be offered at the following locations:

- ▶ November 27, 2001 – Flint
- ▶ November 29, 2001 – Gaylord
- ▶ December 4, 2001 – Novi
- ▶ December 6, 2001 – Kalamazoo
- ▶ December 11, 2001 – Warren
- ▶ December 13, 2001 – Grand Rapids

The West Michigan Chapter of the AWMA is pleased to be a co-sponsor of this seminar.

SCHOLARSHIP PROGRAM

Your chapter of the AWMA is pleased to offer a scholarship opportunity to students studying at a west Michigan college or university for a career in a pollution control, hazardous waste management or other environmental area. The program has been expanded this year to include the following colleges and universities: Albion College, Aquinas College, Calvin College, Cornerstone University, Ferris State University, Grand Valley State University, Hillsdale College, Hope College, Kalamazoo College, Michigan State University, Michigan Technological University, Northern Michigan University, and Western Michigan University. Five scholarships of \$1,000 each will be awarded. The winners will be announced at our spring conference in March 2002. This year we are also pleased to offer qualifying applicants a one-year membership in the AWMA.

Look for more information on the program in upcoming newsletters or contact Jody Mastroeni at 616-451-2800 or jmastroeni@cirrusenv.com.

NEW EXECUTIVE OFFICERS:

Officers - Sue Pemberton (Chair)
John Byl (Vice-Chair)

Past
President - Marc Groenleer

Secretary - Janet Vail

Treasurer - Ron Blouw

Directors - Ken Evans
Jim Enright
Dave Preston
Jody Mastroeni
Danielle Ouendag
Jill Koebbe
Heidi Hollenbach
Mark Horne

REGULATORY UPDATE PLANNED FOR NOVEMBER 14, 2001 LUNCH PROGRAM

MDEQ – AQD and EAD representatives will provide updates on proposed air quality rules and recent changes to hazardous substance release protection regulations at the November Lunch Program. The program is scheduled for 12:00 to 1:30 November 14, 2001 at the Varnum, Riddering, Schmidt & Howlett, LLP offices at Bridgewater Place in downtown Grand Rapids.

Corporate Sponsors

Amway Corporation
Access Business Group
ANR Pipeline Company
Bill Barr, Inc.
BLDI Environmental & Safety Management
Cadillac Renewable Energy
Cirrus Environmental Services
Consumers Energy
Consumers Energy-Campbell Complex
Dart Foundation
Dell Engineering/ERM Group
Delphi Automotive Systems
Denso Manufacturing Michigan, Inc.
Dow Chemical Company
Earth Tech
El Paso Energy
Emcon
Envirologic Technologies
Environmental Coatings, Inc.
Fishbeck, Thompson, Carr & Huber
GMB Architects - Engineers
Haworth, Inc.
Herman Miller, Inc.

Horizon Environmental
Innotec
IPC Communications
Keeler Brass Company
Kurdziel Industries, Inc.
Lacks Enterprises
Law, Weathers & Richardson, PC
Michigan Consolidated Gas
Michigan Manufacturers Association
Miller, Canfield, Paddock & Stone, PLC
Miller, Johnson, Snell & Cummiskey
NTH Consultants
Paulstra CRC
Perrigo Company
RMT, Inc.
Safety-Kleen Corporation
Shepherd Coster Corporation
Steelcase
STS Consultants, Ltd.
Valley City Environmental Services
Varnum, Riddering, Schmidt & HowlettLLP
Warner, Norcross & Judd LLP
Weyerhaeuser Co.

Contributing Organizations

Grand Valley State University – Water Resources Institute
Michigan Department of Environmental Quality

MSU A&WMA Student Chapter

For an information packet on the Corporate Sponsor Program, please contact Ken Evans at (517)788-0404 or e-mail Ken at akevans@cmsenergy.com

**AIR & WASTE MANAGEMENT ASSOCIATION
WEST MICHIGAN CHAPTER
MEMBERSHIP FORM**

Return by fax to: Marc Groenleer, Membership Chair
Phone: (616)957-3690 Fax: (616)957-4386
E-mail: mgroenleer@nthconsultants.com

Your Name _____
Company _____
Address _____
City, State, Zip _____
Recruited by _____
Type of Member Status _____

- 1 – Full Membership, please send the National A&WMA application form.
- 2 – Chapter’s Local Associate, please send the L.A. application form.
- 3 – East Michigan member wishing to also join West Michigan Chapter.

A&WMA – West Michigan Chapter
P.O. Box 465
Ada, MI 49301



AIR & WASTE MANAGEMENT
ASSOCIATION

SINCE 1907

West Michigan Chapter
Chartered 1993

WEST MICHIGAN ENVIRONET

A Newsletter of the West Michigan Chapter of the Air and Waste Management Association

FALL 2001

IN THIS ISSUE:

Title V Compliance Certification	1
Proposed Part 201 Rules	2
Leather Company Creates Alternative to Landfilling.....	3
Iron and Steel Foundry MACT	4
Revised Part 5 Rules.....	6