



## WEST MICHIGAN ENVIRONET

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

Volume No. 10 Issue No. 2

Spring 2002

### **CONGRESS REFORMS CERCLA (AGAIN) AND AUTHORIZES BROWNFIELD FUNDING**

*By James P. Enright, Esq.  
Law, Weathers & Richardson, P.C.*

Congress reformed the liability provisions of the federal Superfund statute (CERCLA) and authorized federal funding for brownfield redevelopment before breaking for the winter holidays. President Bush signed the legislation on January 11.

Although many may believe that CERCLA became superfluous through Michigan's extensive reform of Part 201 in 1995 and EPA's deference to Part 201 through an agreement with MDEQ, many companies remain involved at CERCLA sites and others are attempting to redevelop those sites. The amendments provide significant benefit to those companies. CERCLA liability reforms include:

1. De micromis liability exemption for transporters and generators: Persons that allegedly transported or arranged for disposal of hazardous substances in small amounts (less than 110 gallons of liquids or less than 200 pounds of solids) before April 1, 2001 would have this liability exemption.

2. Inability to Pay: Companies that are financially incapable of paying their alleged CERCLA liability may settle for smaller amounts that leave them capable of continuing in business. Although EPA has long had an inability to pay policy for settlements, perhaps such settlements will occur sooner and more often in light of Congress's recent action.

3. Bona Fide Prospective Purchasers: Purchasers of property that qualify as "bona fide prospective purchasers" would have a liability exemption. To be a bona fide prospective purchaser, a person must perform specified environmental due diligence before the purchase, not have disposed of hazardous substances at the property before the purchase, and exercise "care" after the purchase. "Care" consists of

exercising appropriate care toward hazardous substances found at the facility by taking reasonable steps to stop any continuing release, prevent any threatened future release, and prevent or limit certain exposures to previously released hazardous substances.

4. Contiguous Properties: This new liability exemption covers persons who own property that is contiguous or "similarly situated" to property owned by others where a hazardous substance release or threatened release occurs. The new exemption also expressly applies to contamination migrating via groundwater. The exemption requires taking the same "care" steps as under the bona fide prospective purchaser exemption. Curiously, the wording of the exemption does not clearly cover property operators, such as lessees.

5. More on the Innocent Purchaser Defense: Performance of Phase I environmental site assessments, transaction screens, and other property-related environmental due diligence largely stems from a long and complex statutory definition that invokes a defense to CERCLA liability for unknowing "innocent purchasers" of contaminated property. Congress has now tweaked the definition to specify some of the steps that constitute sufficient environmental due diligence and to require EPA to promulgate rules on this topic. The person must also conduct the same steps as constitute "care" under the bona fide prospective purchaser exemption.

6. Municipal Solid Waste Exemption: The amendments create a liability exemption for persons who are (a) owners, operators, or lessees of residential property, (b) small business concerns under the Small Business Act, or (c) 501(c)(3) organizations, when the

municipal solid waste was generated from their properties.

As is typical of CERCLA, these exemptions have exceptions and prerequisites that must be reviewed carefully before deciding to rely on them.

Congress also authorized funding a brownfield redevelopment program at the level of \$200 million per year for federal fiscal years 2002 through 2006, however, the money has not actually been appropriated. President Bush announced that the Administration will propose \$200 million in the budget for FY 2003 (October 1, 2002 - September 30, 2003) and \$25 million in a related program.

Finally, the CERCLA amendments recognize the various state voluntary cleanup and redevelopment programs by providing that no CERCLA enforcement will be undertaken when action is occurring under a state program, with certain exceptions.

## **UPDATE OF IMPORTANT FEDERAL AND STATE OF MICHIGAN ENVIRONMENTAL REPORTING REQUIREMENTS FOR 2002**

*By Ron Vriesman, P.E.*

*Environmental Resources Management (ERM)*

Several important changes in reporting requirements are occurring in 2002. Highlights for the 2002 reporting year include:

- reduced lead and lead compound thresholds for Form R reporting,
- hazardous waste biennial reporting with MDEQ revisions; and
- the new Michigan Annual Wastewater Report.

Some of the key Federal and State reporting requirements and their corresponding deadlines are listed below.

**Tier I / Tier II** • Reporting threshold for storage of hazardous chemicals (as determined from MSDSs) is 10,000 pounds. In addition, certain chemicals classified as Extremely Hazardous Substances have reporting thresholds of 500 pounds or the threshold planning quantity, whichever is lower.

**Biennial Hazardous Waste** • Applies to Large Quantity Generators of hazardous waste (generating more than 2,200 pounds of hazardous waste and/or 2.2

pounds of acute hazardous waste in a calendar month). Calendar year 2001 hazardous waste management activity, must be reported in 2002.

**Michigan Air Emissions Reporting System (MAERS)** • Reporting year 2001 marks the fourth year with the revised MAERS forms. The MDEQ continues to modify and improve the reporting system. In general, similar equipment is grouped as a single unit, and total emissions from each unit are reported to MDEQ-AQD. The MAERS forms, designed for electronic reporting are due by 15 March.

**Hazardous Materials Registration** • Registration is required for each facility that offers or transports shipments of hazardous materials. Registration applies to various chemical material categories and activities, including hazardous materials: 1) classified as radioactive, explosive, or toxic gases; 2) managed in bulk packaging; and/or 3) requiring placarding during shipping. A business may register for one, two or three years.

**SARA Title III, Form R** • Applies to facilities with 10 or more full time employees that operate under a Standard Industrial Classification (SIC) code 10, 12, 20 through 39, 4911/31/39/53, 5169/71 and 7389 (some exceptions apply), and which manufacture or process 25,000 pounds or otherwise use 10,000 pounds or more of a listed chemical. Various chemicals were added to the list, and PBT chemical thresholds were revised for the 2000 reporting year. Lead thresholds have been lowered for the 2001 reporting year.

**Annual Wastewater Report (AWR)** • Replaces the Michigan Critical Materials and Wastewater Report. The new Annual Wastewater Report applies to most facilities discharging industrial and commercial process wastewater to waters of the State or to a sewer system. Data collection for affected facilities began 1 January 2001, with submittal of the first Annual Wastewater Report by 1 August 2002.

**Wastewater Continuing Compliance** • Applies to facilities discharging process wastewater to local treatment plants and/or surface water, that: conduct one or more "categorical" processes; have a process wastewater discharge of 25,000 gallons per day or more; or are requested to submit a report by a designated regulatory agency.

In addition to these, facilities should also remember NESHAP reports, ROP Deviation/Certification reports, etc.

Report Type	Subject	Due Date	Submit To
<u>Tier I/Tier II</u>	Hazardous Materials Storage	March 1	MDEQ-EAD, LEPC Local Fire Department
<b>Biennial Hazardous Waste</b>	Hazardous Waste Management Activity	March 1, even numbered years	MDEQ
<b>Michigan Air Emissions Reporting System (MAERS)</b>	Air Emissions	March 15	MDEQ District AQD
<b>Hazardous Material Registration</b>	Hazardous Material Handling Activity	July 1	U.S. DOT
<b>SARA Title III, Form R</b>	Environmental Releases of Chemical Materials	July 1	EPA MDEQ
<b>Annual Wastewater Report</b>	Wastewater Discharges	August 1 Starting 2002	MDEQ-EAD
<b>Wastewater Continuing Compliance</b>	Wastewater Quality and Quantity	Semi-Annually	Local POTW

AQD – Air Quality Division  
EAD – Environmental Assistance Division  
POTW – Publicly Owned Treatment Works

LEPC – Local Emergency Planning Committee  
U.S. DOT – United States Department of Transportation

## ***POLLUTION PREVENTION (P2) – A SHIFTING PARADIGM***

*By Laura L. Rauwerda, P2 Field Representative  
Michigan Department of Environmental Quality*

### **Introduction**

The Michigan Department of Environmental Quality (DEQ) has been committed to pollution prevention since 1996, when it was charged with the responsibility of developing and implementing a comprehensive strategy to promote the concept throughout the State. A major objective of this strategy was to encourage and increase voluntary pollution prevention activities in Michigan through partnerships with stakeholders such as businesses, institutions, local communities and health departments.

The Environmental Assistance Division (EAD) of the DEQ oversees a number of assistance and information activities leading to improvement in environmental quality, with an emphasis on pollution prevention. The mission of EAD is to “provide timely and effective information and assistance to Michigan businesses, municipalities, public agencies, and the public in understanding and meeting their environmental protection responsibilities.”

### **What is Pollution Prevention?**

Pollution prevention (P2) is the elimination or minimization of the generation of waste at its source. Effective P2 also includes environmentally sound on-site or off-site recycling or reuse of those wastes that cannot be eliminated.

The patterns of P2 traditionally demonstrate a proactive, voluntary stewardship toward the protection of natural resources through such programs as household hazardous waste collections and curbside recycling. In recent years, however, the P2 paradigm has shifted to a broader vision of sustainable practices. Water use, energy consumption and process waste streams are now a major focus of P2 activities. The reduction of waste at its source is a key component of pollution prevention and is often achieved through such simple actions as the use of alternative products, process and technology changes, and good operating practices.

### **Recycling –Saving and Making Money**

Although technical applications to implement source reduction will always impact waste disposal practices and production costs, recycling has long been the least controversial environmental activity and is now proving, as most expected, to be a very effective P2 tool as well as an economic benefit.

As a leader in the Midwest Region, Michigan promotes many recycling efforts throughout the state. The DEQ has developed a number of tools to assist businesses in finding a market for recycled materials. The ***Michigan Recycled Materials Market Directory*** is a searchable database intended for use to identify processors, collectors and brokers of reclaimed materials. These materials may include, but are not limited to paper, plastic, glass, drums and barrels.

Another way to reclaim material is to find someone else who can use it. The ***Michigan Materials Exchange Service*** is intended to assist industrial and

commercial businesses in this endeavor. Using the exchange saved a Michigan paper company over \$2,000 in disposal costs, and increased warehouse and landfill space by finding an alternative use for 70,000 pounds of off-specification liner paper.

Both databases are available at <http://www.deq.state.mi.us/ead/recycle/>. For additional information on recycling in Michigan contact Lucy Doroshko at (517) 373-1322.

### **Recognizing the Value of Recycling**

A recent study released in July, 2001 indicates that the nation's recycling and re-use industry is now a viable force in the U.S. economy. The U.S. Environmental Protection Agency (EPA) has announced that the Midwest States of Illinois, Indiana, Ohio, Michigan, Minnesota and Wisconsin lead the nation in economic impacts of recycling. These states combined are home to 8,000 recycling and re-use businesses, employing 275,000 workers with a payroll of nearly \$10 billion, and gross annual sales of more than \$62.5 billion. It is now recognized that returning commodities to the stream of commerce is supporting large private sector investments in downstream processing and manufacturing.

The U.S. Recycling Economic Information (REI) Study is available at <http://www.epa.gov/jtr/econ/rei-rw/rei-rw.htm>.

### **CLEAN AIR ACT UPDATE: SECTION 112(j)**

*By Jeff Pfost and Mark Horne, P.E.  
Environmental Resources Management, Inc.*

#### ***What's All the Fuss?***

To hear air professionals talk these days, one would think there were mad carpenters on the loose. There is talk of hammers falling. What is going on, and why might it be significant for major sources of hazardous air pollutants (HAPs)? Read on for the rest of the story.

Most environmental professionals are aware that new emission standards have been, or will be, established to reduce HAP emissions. These standards, developed under Section 112(d) of the Clean Air Act, are written for specific source categories. They are commonly referred to as maximum achievable control technologies, and you may recognize them as MACT standards.

The USEPA has been required to develop and publish these MACT standards to reflect the control performance of the top performing source for new sources, or the average of the top performing 12% for

existing sources. All sources affected by the MACT standard are then required to make necessary changes to bring their level of control up to that standard.

The MACT standards must be established in accordance with a specific timetable. Section 112(j) of the Clean Air Act stipulates actions that an affected source must take if the EPA does not meet the timetable. In effect, if a MACT standard is late, an affected source must make a case-by-case determination and proposal of a control strategy that would be equivalent to that which the EPA would have called for had they acted in a timely fashion. To make matters worse, once the EPA finally publishes the MACT standard, if the controls previously established by the source under 112(j) are less stringent than those called for by the EPA, the source must upgrade to meet the new standard. Clearly, this would not be a good situation.

So now, what's all the fuss? Well, it looks like the EPA is going to be late. And not just on a few MACTs, but for as many as 50. Therefore, 112(j) is about to become a reality to a large number of unsuspecting facilities. Now, a bit more about 112(j) and what affected sources must do.

112(j) is commonly referred to as a "hammer provision." The name comes from the fact that certain statutory control measures will be imposed in the event the implementing agency (in this case, the EPA) fails to publish final regulations on time. Such "hammer" provisions not only impose onerous duties on affected sources, they also saddle state agencies with excessive resource burdens. State agencies (i.e. the MDEQ AQD) must review, evaluate, approve/disapprove, and act upon all of these unique proposed control strategies without having an established standard for guidance.

When is this hammer going to fall? Mark your calendars: **May 15, 2002**. The final and largest group of MACT standards, commonly referred to as "the 10 year bin," were due by November 15, 2000. The hammer falls 18 months after the EPA misses the deadline. While some of the standards in the 10 year bin have been completed, the EPA has indicated that the majority of the standards (up to 50) will not be completed by the May 15, 2002 112(j) hammer deadline.

But wait, some relief is on the way! On April 5, 2002, the EPA issued a final rule to relax the 112(j) requirements to allow for the submission of a notification by May 15, 2002 ("Part 1 Application"), and a follow-up submittal of a case-by-case control strategy ("Part 2 Application") 24 months after the initial notification. Also, the MDEQ AQD has posted a Part 1 application form on their website.

What is a source to do? If your operation is major for HAPS and you believe you may be affected by an upcoming MACT standard, do your homework. Remember, even if you are currently under a MACT standard, many sources are or will be affected by multiple MACT standards. Therefore, check the EPA web page ([www.epa.gov/ttn/atw](http://www.epa.gov/ttn/atw)) for a current listing of all the source categories and standards to see if you may be affected by an upcoming MACT standard. This web site contains a list of the MACT standards, the status of the MACT development process, and an EPA contact for the standard. Download as much information as possible regarding the MACT standards of interest and prepare for your first notification deadline, May 15, 2002.

### ***BE ALERT TO MOST COMMON HAZARDOUS WASTE VIOLATIONS***

*By Dale DeKraker  
MDEQ – WMD*

MDEQ – Waste Management Division Staff visit West Michigan operators in response to complaints, spills, and to conduct regular inspections. Years of experience have shown that some violations are routinely encountered by visiting inspectors. The following is a list of frequently encountered violations. If you have questions contact Dale DeKraker at (616) 356-0208.

#### **WASTE DETERMINATION VIOLATIONS**

1. Failing to properly identify all the hazardous waste generated at the business. Commonly overlooked wastes include, but is not limited to, partially empty aerosol cans, electric lamps, electronic equipment, batteries, antifreeze, rags and other textiles, sorbents, spent paint filters, spent activated carbon filter media, and sand blasting residue.
2. Failing to have waste evaluations documented and keep records for at least 3 years.

#### **RECORDKEEPING VIOLATIONS**

1. Failing to have a copy of manifest signed by designated facility within the applicable timeframe.
2. Failing to send manifest copies within the applicable timeframe to the Waste Management Division; and if sending to an out of state treatment, storage, and disposal

facility, failing to send manifest copies to both the Waste Management Division and the other state agency.

#### **WASTE ACCUMULATION AREA VIOLATIONS**

##### General:

1. Leaving containers exposed to weather or vandals.
2. Lacking or inadequate secondary containment including:
  - Lacking or inadequate resistant coating.
  - Lacking or inadequate squirt protection.

##### Satellite Accumulation

Generators may choose to accumulate waste in limited amounts at or near the point of generation under specific conditions. This practice is commonly referred to as satellite accumulation [R 299.9306(2)]. Violations include failing to keep satellite containers closed, except when waste is added or removed.

#### **EMERGENCY PLANNING AND TRAINING VIOLATIONS**

##### Planning Violations:

1. Large Quantity Generators
  - Missing, outdated, or incomplete emergency coordinator and other contacts information including addresses and home phone numbers
  - Failing to include an evacuation plan that includes the signal to begin evacuation, evacuation routes and alternative evacuation routes
2. Small Quantity Generators
  - Missing, outdated, or incomplete emergency posting information by telephones for Small Quantity Generators
  - Failing to make arrangements with outside organizations, such as fire department, police, hospitals, local emergency planning committees, etc., that you would need to call if an emergency occurred.

### Training Violations:

1. Missing or incomplete documented records of required training for Large Quantity Generators
  - Missing job title
  - Missing job description
2. Using other emergency training programs required by other regulations, including videos or seminars, which do not have a portion clearly devoted to the hazardous waste requirements and does not cover the facility's contingency plan

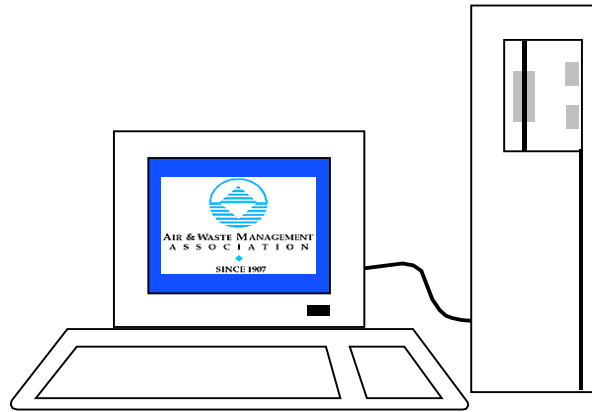
### Used Oil Management:

- Failure to label containers and tanks with the words "used oil."

### Universal Waste Management

- Failure to properly label containers with the required wording.
- Exceeding the one year accumulation time limit.

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



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## Chapter News

### **CONGRATULATIONS TO SCHOLARSHIP RECIPIENTS**

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 were awarded this year. The winners were announced at our spring conference in March 2002.

Profiles of the scholarships follow:

William Paul  
Western Michigan University  
Senior- Hydrogeology and Mathematics

I first got interested in geology when I began hiking. I always wondered how all the different landscapes I visited evolved. When I began college here at Western, my father told me about the hydrogeology program. He, being in the environmental field, knew the caliber of the program and department at Western Michigan. Ever since I decided on Hydrogeology as a major, I have never looked back. So, unlike some other college students, I can actually say that I enjoy what I study. It's not easy at all, but it is a field that I consider very rewarding. I hope to graduate in April of 2003 and continue on to a master degree.

Rhoda deJonge  
Calvin College  
Senior-Biology and Environmental Studies

Family trips of hiking, canoeing, exploring and simply living were the classrooms of my desire for conservation of natural areas. My father instilled in my siblings and I, care for the land with belief in a greater responsibility for the earth. There is so much value beyond human use, which we must maintain as servants of the Creator. With these convictions I hope to continue my education by attending graduate school or obtain my pH. I plan to study ecosystem ecology further so that I may become a restoration ecologist. I hope to support and preserve all parts of creation for generations to come and its voiceless inhabitants.

Adam P. Eisele  
Michigan State University  
Senior-Biosystems Engineering w/  
Environmental/Natural  
Resource Emphasis

I chose to study Environmental Engineering because I have always possessed a special interest towards maintaining the fragile environment. My enthusiasm towards environmental engineering has continued to increase as I have progressed through my schooling. I have also developed a keen interest for air quality-related issues after a summer internship at NTH Consultants in Grand Rapids. I plan to participate in another internship related to air Quality this summer as well. After graduation, I would like to work for an Environmental consulting firm as an engineer in the air quality field. My ultimate goal is to have a successful career as a professional engineer working in an environmental consulting firm.

Jennifer Koehler  
Michigan Technological University  
Senior-Environmental Engineering

To tell you a little more about myself, I am currently a fourth year environmental engineering major at Michigan Technological University. I am also working on minors in International Spanish and Interdisciplinary Remote Sensing. Ever since I was young, I have always been aware of the state of our environment and the need for preservation. So my interest in a career in environmental engineering was not surprising. I have spent time working in industry (a leading paper producer) and also recently studied environmental issues abroad in Mexico. Now I am turning my focus towards environmental consulting services, mainly on water resources.

Julie Ryan  
Western Michigan University  
Second year Master's degree student  
Aquatic Ecology

While taking a general ecology course at Loyola University Chicago, I became fascinated with the variety of organisms in aquatic environments, particularly the invertebrates. As I learned about current environmental issues, I became more interested in the factors affecting the health of freshwater ecosystems. After graduation, I worked on projects evaluating the impacts of exotic species and over-fishing on lakes and streams. Currently, I am working toward my graduate degree at Western Michigan University. I am examining stream invertebrates, and the possible methods of protecting aquatic organisms from pollutants, including PCBs. With the knowledge I am gaining, I hope to help protect aquatic ecosystems for the enjoyment of future generations.

### ***COMING EVENTS:***

***May 15, 2002*** - Lunch and Tour of Grandville Wastewater Treatment Plant. Enjoy lunch before the tour at Grand Villa beginning at noon on the 15th. Cost of the event including lunch is \$15.00. Contact Jim Enright for details at (616) 732-1705.

***June 7, 2002*** – Annual Golf Outing and Tour of Kurdziel Foundry. Tour of foundry begins at approximately 9:30 a.m. Contact Marc Groenleer for details at (616) 575-1012.

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Return by fax to:        Marc  
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Phone: (616)957-3690 Fax: (616)957-4386  
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- \_\_\_\_\_  
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



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West Michigan Chapter  
Chartered 1993

SPRING 2002

### IN THIS ISSUE:

Congress Reforms CERCLA (Again) and Authorizes Brownfield Funding.....	1
Update of Important Federal State of Michigan Environmental Reporting Requirements for 2002.....	2
Pollution Prevention (P2)- A Shifting Paradigm .....	3
Clean Air Act Update: Section 112(j) .....	4
Be Alert to Most Common Hazardous Waste Violations.....	5