ATTACHMENT 11

AMBIENT AIR MONITORING PROGRAM

US ECOLOGY MICHIGAN
MID 074 259 565

GLOSSARY

Effective April 22, 2019, the Michigan Department of Environmental Quality (DEQ), Waste Management and Radiological Protection Division (WMRPD), became the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD).

40 CFR	Title 40 of the Code of Federal Regulations
ABR	Adopted by reference
Act 207	Michigan Fire Protection Act, PA 207, as amended
Act 451	Natural Resources and Environmental Protection Act, 1994 PA 451, as amended
Dynecol	former name of facility, now known as US Ecology Detroit North, Inc US Ecology Michigan?
EPA	United States Environmental Protection Agency
HWSA	Hazardous and Solid Waste Amendments of 1984
Part 111	Part 111, Hazardous Waste Management, of Act 451
Part 111 Rules	Administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Act 451
R	Rule (example: R 299.9504)

FORM EQP5111 ATTACHMENT TEMPLATE MODULE B.5
SUPPLEMENTAL INFORMATION: ENVIRONMENTAL MONITORING PROGRAMS

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Construction Permit and Operating License Applications, Hazardous Waste Treatment Storage and Disposal Facilities.* See Form EQP 5111 for details on how to use this attachment.

Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, Rule 299.9611 establishes requirements for the environmental monitoring programs for hazardous waste management facilities. Owners and operators of hazardous waste treatment, storage, or disposal facilities must develop an environmental monitoring program capable of detecting a release of hazardous waste or hazardous waste constituents from the facility to groundwater, air, or soil.

This license application module addresses requirements for an environmental monitoring program for hazardous waste management units and the hazardous waste management facility for the (Dynecol, Inc.) facility. The module includes either a monitoring program description or a demonstration for a waiver from the monitoring requirements in accordance with R 299.9611(3)(a) and (b), and R 299.9611(4) as indicated below:

Groundwater Monitoring Program *(Check as appropriate)*

N R 299.9612 compliant monitoring program and sampling and analysis plan for one or more units.
Y Waiver for one or more units.

Ambient Air Monitoring Program

Y Monitoring Program and sampling and analysis plan.
N Waiver.

Annual Soil Monitoring Program

N Monitoring program and sampling and analysis plan.
Y Waiver.

This module is organized as follows:

5.A GROUNDWATER MONITORING PROGRAM

5.A(1) Groundwater Monitoring Program Waiver

5.A(1)(a) Land Disposal Unit

5.B AMBIENT AIR MONITORING PROGRAM

5.C SOIL MONITORING PROGRAM

5.A GROUNDWATER MONITORING PROGRAM {R 299.9611(2)(b) and (3), R 299.9612, R 299.9629, and Title 40 of the Code of Federal Regulations (40 CFR) 264 Subpart F, which is adopted by reference (ABR) in R 299.11003, except 40 CFR 264.94(a)(2) and (3), (b), and (c), 264.100, and 264.101}

5.A(1) Groundwater Monitoring Program Waiver {R 299.9611(3)}

5.A.(1)(a) Other Units {R 299.9611(3)(a)}

☐ Groundwater monitoring is not required at the *(Dynecol, Inc.)* facility.

All waste handling and storage activities at the Dynecol facility take place under a structure that provides protection from precipitation and run-off, and the facility is in compliance with Part 6 Rules of Michigan Act 451. Therefore, Dynecol received a waiver for the groundwater monitoring requirements under Rule 299.9611 (3)(a) for the various hazardous wastes and hazardous waste constituents, which are stored within the facility. The waiver is provided in Appendix B3-3.

See Module B4, Sections B4.A(2)(c) and B4.A(2)(e) for information on geology and hydrogeology at the facility.

5.B AMBIENT AIR MONITORING PROGRAM
{R 299.9611(2)(c) and (4)}

5.B(1) SAMPLING AND ANALYSIS PLAN
{R 299.9611(2)(a)}

A sampling and analysis plan for ambient air monitoring is included in the QA/QC plan in Section 5.B.1(g), see below and Appendix A3-2. The sampling and analysis plan was prepared in accordance with the requirements specified in R 299.9611(2)(a). All sampling and analysis performed pursuant to this application will be consistent with the QA/QC plan (see below) and Appendix A3-2. All samples for the purpose of environmental monitoring will be collected, transported, stored, and disposed of by trained and qualified individuals in accordance with the QA/QC plan and see Table B5-3.

The *(Dynecol, Inc.)* facility will conduct ambient air monitoring to detect violations of the provisions of Part 55 of Act 451.

The purpose of the ambient air-monitoring program is to determine Dynecol's contribution to atmospheric concentrations of air pollutants, as may be required by MDEQ (grandfathered by Wayne County Air Quality Management Division (WC AQMD)) or other relevant agencies.

In the treatment plant, the waste treatment process includes primary treatment, secondary treatment, and solids dewatering. The types of wastes received for treatment are hazardous wastes due to their corrosivity, TCLP metals content, TCLP organics content, and listed wastes (F006, F019, F039, K061, K062, U134), (see Module A2).

The CMF located adjacent to the bulk treatment area, meets the minimum setback requirement of 50 feet from the property line (See Appendix C1). This facility is designed to receive, store, and transfer hazardous wastes in containers of various sizes and in bulk.

Dynecol performs the required data evaluation in accordance with the permit and regulations. If any issues and/or violations are detected, Dynecol will perform the required agency notification.

5.B(1)(a) Monitoring Parameters

The monitoring parameters as described below are applicable to the time of submittal of the Act 451 Permit Reapplication. It is anticipated that these might be modified as directed by the relevant regulatory agency.

5.B(1)(a)(i) Inorganics

Monitoring parameters for inorganics are currently composed of the following: total suspended particulates (TSPs), arsenic, lead, and chromium. The analytical detection limits are listed in Table B5-1. It is noteworthy that during the Fall of 1994, WC AQMD agreed to drop four parameters from the required monitoring list (cadmium, copper, nickel, and zinc) based on their review of the facility's ambient air monitoring data from the previous years.

5.B(1)(a)(ii) Organics

The historical monitoring parameters for organics and their respective analytical detection limits are listed in Table B5-2. The facility is currently not sampling for organics.

5.B(1)(b) Updated Information on Monitoring

Per Act 451 R299.9611(4), upon completion of installation of concrete in the existing truck parking area, Dynecol will request a waiver from air monitoring program from the MDEQ, Air Quality Division.

5.B(1)(c) Samplers and Locations

5.B(1)(c)(i) Inorganics

The ambient air monitoring system for inorganics consists of three monitoring stations with locations as follows: northeast corner (main office parking lot), east corner (east truck entrance gate), and southwest corner of facility (see Figure A1-4). All locations are selected and approved by the MDEQ Air Quality Division. Sampling is performed by use of high-volume samplers.

5.B(1)(d) Sampling Schedule

5.B(1)(d)(i) Inorganics

The sampling schedule for the high volume samplers is every sixth day to coincide with the USEPA national sampling schedule.

5.B(1)(e) Sampling Methods

5.B(1)(e)(i) Total Suspended Particulates and Metals

Each sampling site will contain a high-volume sampler that meets the requirements specified in 40 CFR 50. All samplers will be equipped with continuous flow recorders as a measure of sampling documentation. Each sampler is placed on an elevated platform about ten feet above ground level. The high-volume samplers will be operated according to the procedures outlined in 40 CFR Parts 50 and 58, and the "Quality Assurance Handbook for Air Pollution Measurement Systems," Volume I and II. The samplers will operate on a 24-hour sampling period each day.

5.B(1)(f) Analytical Methods

5.B(1)(f)(i) Total Suspended Particulates

The total weight gain of each filter will be determined by using a laboratory analytical balance accurate to 0.1 milligrams. The filters will be desiccated and weighed to a constant weight.

5.B(1)(f)(ii) Heavy Metals

Analysis of heavy metals will be in accordance with the guidelines of 40 CFR Part 50, Appendix G.

5.B(1)(g) QA/QC Procedures

5.B(1)(g)(i) Calibrations

The flow rate of the samplers will be calibrated annually. Each month, a five-point flow check bracketing 50 cubic feet per minute (cfm) shall be conducted and documented using a certified flow transfer standard. The operational flow rate during sample collection must be within +/- 10% of 50 cfm.

5.B(1)(g)(ii) Audits

The high volume samplers will be audited once per year in accordance with 40 CFR 58, Appendix A. The device used and the personnel conducting the flow audit will be different than the person who conducts the monthly flow checks, conducts the sampling, or services the sampler.

5.B(1)(g)(iii) Precision

Precision checks will be in accordance with 40 CFR 58, Appendix A. One of the downwind sites will be designated as the precision site. The high volume filter from this site will be split each sampling episode to obtain the precision sample for the metal analysis.

5.B(1)(g)(iv) Accuracy

Accuracy checks for the metals will be conducted be depositing a known amount of the metal solution on an unexposed filter strip and analyzing it using the same procedures as for the field samples.

5.C ANNUAL SOIL MONITORING PROGRAM
{R 299.9611(2)(d) and (4)}

5.C(1) SAMPLING AND ANALYSIS PLAN
{R 299.9611(2)(a)}

All areas of the Dynecol Facility where hazardous wastes are managed are essentially paved with either concrete or blacktop and some specific areas (the storage bays in the container management area and the unloading pad in the treatment area) are coated with chemical-resistant materials, thus protecting the surface soils from possible contamination in the event of a release. Dynecol received a waiver from soil monitoring requirements as referenced by Michigan Act 451 R 299.9611(2)(d), prior to the May 2, 1990 issuance of Dynecol's operating permit (see Appendix B3-3).

Table B5-1

Monitoring Parameters for Inorganics (Historical)

Parameters	Expected Detection Limits (ug/m)
Arsenic (Ar)	0.30
Chromium (Cr)	1.00
Lead (Pb)	1.00
Particulate	1.00

Table B5-2

Monitoring Parameters for Organics (Historical)

Parameters	Expected Detection Limits (ug/m)
Benzene	0.01
Carbon Tetrachloride	0.01
Chlorobenzene	1.00
Chloroform	0.01
Ethylbenzene	1.00
Methylene Chloride	0.01
Tetrachloroethane	1.00
1,1,1-Trichloroethane	1.00
1,1,2-Trichloroethane	1.00
Trichloroethylene	0.01
Toluene	1.00
Xylene	1.00
1,1,2,2-Tetrachloroethane	0.01
1,1,1,2-Tetrachloroethane	0.01

Table B5-3

Sample Preservation and Analytical Procedures

Measurement	Container [a]	Preservative[b]	Holding Time[c]	Sample Size (ml)	Reference
Mercury, arsenic selenium	P,G 0.05%$K_2Cr_20_7$	HNO_3 to pH<2	28 days	100(forall3)	303E: F(1)
Metqals except above	P.G	HNO_3 to pH<2	6 months	100 each 303 A-E (1)	200-289 (2)
Chloride P,G	None required	28 days	50	407 A:BD(1)	
Nitrate P,G	Cool, 4°C	48 hours	100	418 C:F (1)	
Bicarbonate alkalinity	P.G	Cool, 4°C	14 days	250	403 (1)
Sulfate P,G	Cool, 4°C	28 days	50	407 A: B; D (1)	
Specific conductance	P.G	Cool, 4°C	28 days	100	205 (1)
Hydrogen ion (pH)	P.G	Determine on site	2 hours	25	423 (1)

a = Polyethylene (P) or glass (G).

b = Sample preservation should be preformed immediatley upon sample collection. For composite samples, each aliquot should be preserved at the time of collection. When use of an autmatic sampler makes it impossible to preserve each aliquot then samples may be preserved by maintaining at 4°C until compositing and sample splitting is completed.

c = Samples should be analyzed as soon as possible after collection. The times listed are the maximum times that samples may be held before analysis and still be considered valid. Samples may be held for longer periods only if the permitted, or monitoring laboratory, has data on file to show that the specific types of samples under study are stable for the longer time. Some samples may not be stable for the maximum time period given in the table. A permitted, or monitoring laboratory, is obligated to hold the sample for a shorter time if knowledge exists to show this is necessary to maintain sample stability.

d = Samples should be filtered immediately on site before adding preservative for dissolved metals.

Source: Guidelines Establishing Test Procedures for the Analysis of Pollutants: Proposted Regulations. 40 CFR, Part 136, October 26, 1984.

Method References:

1) "Standard Methods for the Examination of Water amd Wastewater", 15th edition: APHA, AWWA, QWPCF, 1980

2) "Methods for Chemical Analysis of Water and Wastes", USEPA-600/4-79-020; revised March, 1982

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

March 17, 2014

PERMIT TO INSTALL
302-07A

ISSUED TO
US Ecology, Inc.

LOCATED AT
6520 Georgia Street
Detroit, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
M4008

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **January 7, 2014**	
DATE PERMIT TO INSTALL APPROVED: **March 17, 2014**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO_2e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H_2S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO_x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b) A visible emission limit specified by an applicable federal new source performance standard.
    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUSTABILIZE	Liquid waste stabilization process. Process consists of (3) 30,000 gallon processing pits in a single building controlled by (2) dust collectors.	----
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.		

The following conditions apply to: EUSTABILIZE

DESCRIPTION: Liquid waste stabilization process. Process consists of (3) 30,000 gallon processing pits in a single building controlled by (2) dust collectors.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT:
Two dust collectors

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.002 grains/dry standard cubic foot	Test protocol*	EUSTABILIZE	GC 13 SC III.3, IV.1	R 336.1331
2. PM	0.69 pph	Test protocol*	EUSTABILIZE	GC 13 SC III.3, IV.1	R 336.1225 R 336.1331
3. VOC [A]	14.6 tpy	12-month rolling time period as determined at the end of each calendar month	EUSTABILIZE	SC VI.2, VI.3, VI.4, VI.5	R 336.1702(a)
4. Naphtha	3.5 pph[1]	Test protocol*	EUSTABILIZE	GC 13 SC VI.2, VI.4	R 336.1225

* Test protocol shall specify averaging time.
[A] "VOC" means "volatile organic compound" as defined in Rule 122 (R 336.1122). This includes semi-volatile organic compounds [B] (SVOC), as that term is used in this Permit to Install.
[B] For this Permit to Install, semi-volatile organic compounds (SVOC) means any VOC, as defined in R 336.1122, with a vapor pressure at standard conditions of less than 0.075 millimeter of mercury.

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Total VOC content, excluding SVOC, of waste received for treatment	5.0 percent	Each shipment of non-hazardous waste received for treatment	EUSTABILIZE	SC VI.2	R 336.1225, R 336.1702(a)
2. Total hazardous waste constituents content of hazardous waste received for treatment	500 ppmw	Each shipment of hazardous waste received for treatment	EUSTABILIZE	SC VI.2	R 336.1225, R 336.1702(a)
3. Total amount of waste treated	600 tons per day[1]	Calendar day	EUSTABILIZE	SC VI.3	R 336.1225
4. Total amount of waste treated	156,000 tons per year[1]	12-month rolling time period [C]	EUSTABILIZE	SC VI.3	R 336.1225

[C] 12-month rolling time period as determined at the end of each calendar month

5. The permittee shall limit the total VOC and SVOC in material processed annually in EUSTABILIZE in compliance with the equation below, based on a 12-month rolling time period as determined at the end of each calendar month.

$$\frac{(\sum_i Mi \times WVi) \times Eri}{14.6\ tons\ per\ year} + \frac{(\sum_j Mj \times WSj) \times Erj}{14.6\ tons\ per\ year} \leq 1.00$$

The terms Mi, WVi, Eri, Mj, WSj, and Erj have the meanings given in Appendix A.
(R 336.1205(3))

6. The permittee shall not treat in EUSTABILIZE any waste shipment containing a component listed below if the shipment's content of that component exceeds the concentration listed below.[1] **(R 336.1225)**

	Component (Chemical Name)	Chemical Abstracts Service Registry Number	Maximum Concentration Allowed in Waste to be Treated (ppmw)
a.	N-Nitroso-N-methylurea	684-93-5	0.01
b.	bis(Chloromethyl)ether	542-88-1	0.1
c.	Hydrazine	302-01-2	1
d.	Furan	110-00-9	1
e.	N-Nitrosodimethylamine	62-75-9	5
f.	Tetranitromethane	509-14-8	5
g.	2-Nitropropane	79-46-9	10
h.	N-Nitrosodiethanolamine	1116-54-7	15
i.	tris(2,3-Dibromopropyl)phosphate	126-72-7	25
j.	Dibromochloropropane	96-12-8	25
k.	Methyl hydrazine	60-34-4	100
l.	Ethylene oxide	75-21-8	100
m.	Acrylonitrile	107-13-1	125
n.	Ethylene dibromide	106-93-4	125
o.	Benzidine	92-87-5	200
p.	Vinyl chloride	75-01-4	250
q.	Acetyl chloride	75-36-5	300
r.	Acrolein	107-02-8	300
s.	N-Nitroso-di-n-propylamine	621-64-7	300
t.	Methyl mercaptan	74-93-1	400

7. The permittee shall not treat hazardous waste in EUSTABILIZE unless such treatment has been approved by the Michigan Department of Environmental Quality under Part 111 of the National Resources and Environmental Protection Act, as amended. **(R 336.1201(3), R 336.1207(1)(a))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUSTABILIZE unless the approved fugitive dust control plan for all plant roadways, the plant yard, all material storage piles, and all material handling operations has been implemented and is maintained. **(R 336.1372, Act 451 324.5524)**

2. The permittee shall keep no more than one bay door to the EUSTABILIZE building open during normal operation, except during unloading, at which time up to two bay doors may be open. Normal operation is defined in Appendix B. **(R 336.1225, R 336.1331)**

3. The permittee shall maintain negative pressure in the EUSTABILIZE building during normal operation. This includes, but is not limited to, complying with SC III.2 and maintaining the treatment building's proper structural integrity. Negative pressure shall be verified using the procedure outlined in Appendix B. **(R 336.1225, R 336.1331)**

4. The permittee shall not operate EUSTABILIZE unless an approved preventative maintenance plan and malfunction abatement plan for the fabric filter control system are implemented and maintained. If the malfunction abatement plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the malfunction abatement plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor. The revised plan shall include procedures for maintaining and operating in a satisfactory manner, EUSTABILIZE, add-on air pollution control devices, or monitoring equipment during malfunction events, and a program for corrective action for such events. **(R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUSTABILIZE unless the two fabric filters (baghouses) are installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes, but is not limited to, following the plan required in SC III.4. **(R 336.1225, R 336.1301, R 336.1331, R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Periodic verification of the negative static pressure in the waste treatment building by testing, at owner's expense, in accordance with Department requirements, is required. The negative static pressure in the waste treatment building shall be determined by using smoke tubes, or an alternative method as approved by the AQD, and by visual observation of the air movement and direction. Alternative testing procedures and associated operational parameters must have prior approval by the AQD District Supervisor. The permittee shall conduct the verification tests at least once every year. Any request for a change in the testing frequency must be submitted to the AQD District Supervisor for review and approval. **(R 336.1225, R 336.1331, R 336.2001, R 336.2003)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations and records in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

2. The permittee shall keep, in a satisfactory manner, calendar month summaries of the VOC and SVOC analyses for liquid waste received for treatment in EUSTABILIZE. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep, in a satisfactory manner, calendar day, monthly, and 12-month rolling time period records of the total amount of waste treated in EUSTABILIZE. The permittee shall keep all records on file at the facility and make them available to the Department upon request.[1] **(R 336.1225)**

4. The permittee shall keep, in a satisfactory manner, daily and cumulative monthly total records of the type (by waste code) and amount of waste treated in EUSTABILIZE. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(3))**

5. The permittee shall calculate the VOC emission rate from EUSTABILIZE monthly, for the preceding 12-month rolling time period, using the method detailed in Appendix A or an alternate format that has been approved by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1702(a))**

6. The permittee shall keep, in a satisfactory manner, negative pressure determination records for the EUSTABILIZE building, as required by SC III.3, SC V.1, and Appendix B. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1331)**

7. The permittee shall perform the calculation in the expression in SC II.5 for waste received for treatment in EUSTABILIZE monthly, for the preceding 12-month rolling time period. The permittee shall keep records of the results of the calculation on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1702, R 336.2802, 40 CFR 52.21)**

8. To demonstrate compliance with SC II.6, the permittee shall keep, in a satisfactory manner, records of the composition of each waste shipment received for treatment in EUSTABILIZE. The permittee shall keep these records on file at the facility and make them available to the Department upon request.[1] **(R 336.1225)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSTACK1	35	32	R 336.1225, 40 CFR 52.21(c)&(d)
2. SVSTACK2	35	32	R 336.1225, 40 CFR 52.21(c)&(d)

IX. OTHER REQUIREMENTS

NA

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

APPENDIX A
Procedure to Determine VOC Emissions from EUSTABILIZE

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the VOC emission limit in SC I.4.

The following formula shall be used to calculate and monitor the VOC emissions from EUSTABILIZE:

$$VOCe = \left[\sum_i (Mi \times WVi)\right] \times Eri \times (1 - Ae) + \left[\sum_j (Mj \times WSj)\right] \times Erj \times (1 - Ae)$$

Where:

VOCe = Cumulative VOC emissions from the unit during the period

i = Each iteration of **VOC**-containing waste stream treated during the time period

Mi = Mass (weight) of waste stream i processed (volume times density)

WVi = Weight fraction of **VOC** present in waste stream i processed

Eri = Emission factor for VOC released from waste during treatment process, based on site specific data and testing, as approved by the AQD District Supervisor.
For VOC components, Er = 0.30 (30% by weight).

j = Each iteration of **SVOC**-containing waste stream treated during the time period

Mj = Mass (weight) of waste stream j processed (volume times density)

WSj = Weight fraction of **SVOC** present in waste stream j processed

Erj = Emission factor for VOC released from waste during treatment process, based on site specific data and testing, as approved by the AQD District Supervisor.
For SVOC components, Er = 3.60×10^{-6} (3.60×10^{-4}% by weight).

Ae = Control efficiency = 0 for EUSTABILIZE (no control)

The permittee shall use the VOC emission factor, VOC capture efficiency and the control device control efficiency cited above. The permittee may request, in writing, to use alternate VOC emission factors to calculate VOC emissions upon approval by the AQD District Supervisor. Any request shall include supporting documentation, including test results, demonstrating the validity of the proposed alternate VOC emission factors.

APPENDIX B
Protocol for Determining Building Negative Pressure

The permittee shall demonstrate that the stabilization building meets the criteria of a permanent total enclosure using US EPA's "Procedure T" described in 40 CFR Section 52.741 or other applicable method approved by the AQD District Supervisor. These criteria are listed as follows:

1. Any natural draft opening (NDO) shall be at least four (4) equivalent diameters from each VOC emitting point.
2. The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.
3. The average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDOs shall be into the building.
4. All access doors and windows whose areas are not included in the area calculation described in item 2 and are not included in the calculation in item 3 shall be closed during normal operation of the process.
5. All VOC emissions must be captured and contained for discharge through the facility exhaust stacks.

The permittee shall perform an annual smoke test to confirm the Procedure T calculation each year, as required by SC V.1. In addition, if any changes are made that affect the original Procedure T calculation for Permit to Install No. 302-07A (such as adding a new door, changing location of process equipment, etc.), then the permittee shall perform a new Procedure T calculation.

Furthermore, the permittee shall implement a standard operating procedure which includes the following:

a) The main system fans shall be maintained according to vendor's recommendations.
b) The treatment building shall be maintained at negative pressure during normal operation. [A]
c) The main system fans shall continue to run for two hours after waste treatment (i.e. mixing of waste with treatment reagents) activities have stopped.

[A] Normal operation is defined as any period that:
(i) Material in the treatment pits is uncovered,
(ii) Material in the treatment pits has been covered for less than two hours,
(iii) The waste and stabilizing agents are being mixed or have been mixed in the previous two hours, and
(iv) Any period when waste has been charged into or discharged from a pit in the previous two hours.

M4008

WAYNE COUNTY

Edward H. McNamara
County Executive

January 8, 1997

Mr. Frank Biermann, President
Dynecol, Inc.
6520 Georgia Street
Detroit, Michigan 48211

SUBJECT: AMENDED PERMIT CONDITIONS - AGREEMENT BY COUNTER SIGNATURE Permit # C-10626 through #C-10632

Dear Mr. Biermann:

This amended letter of approval with conditions supersedes the previous letters of approval with conditions for your hazardous waste processing facility located at 6520 Georgia Street, Detroit. The previous letters of approval with conditions were dated June 13, 1986, March 30, 1989, and September 17, 1991.

Emissions sources and control systems covered by this amended letter of approval with conditions are listed, as follows:

PERMIT NUMBER	EQUIPMENT DESCRIPTION
6917	Caustic Recycle Scrubber (Scrubber-1) 5,000 CFM
6977	Acid Storage Tank No. 12
6978	Acid Storage Tank No. 17
6979	Acid Storage Tank No. 16
6980	Acid Storage Tank No. 13
7425	Dust Collector For Lime Silo Nos. 1 & 2
7426	Secondary Treatment Tank No. 18
7427	Secondary Treatment Tank No. 19
7428	Secondary treatment Tank No. 20
7429	Secondary Treatment Tank No. 21
7430	Lime Storage Silo No. 1
7431	Lime Storage Silo No. 2
8572	Regenerative Activated Carbon Adsorber
8573	Building (Container Processing Facility) Exhaust Fan
8574	Transfer/Bulking Ventilation Hood
9403	Drum Bulking Operation
9404	Caustic Scrubber For The Drum Bulking Operation (Scrubber-2)

9446	Vacuum Process Vessel (Tank # 28)
9447	PERMIT CANCELLED - Drum Shredder not installed
9448	Drum Wash Station(combined organic/inorganic)
10626	Primary Treatment Tank No. 1
10627	Primary Treatment Tank No. 2
10628	Primary Treatment Tank No. 3
10629	Primary Treatment Tank No. 4
10630	Hazardous Waste Storage Tank No. 7
10631	Hazardous Waste Storage Tank No. 10
10632	Caustic Scrubber-3 (500 ACFM)

GENERAL CONDITIONS

1. Not more than 30 days after completion of the installation, the applicant shall apply, in writing, for a Certificate of Operation. Written application should be sent to: Director of Enforcement Services, Wayne County Department of Environment, Air Quality Management Division, 640 Temple Street, Suite 700, Detroit, Michigan 48201-2558.

2. Trial operation of this emission source shall be allowed for 90 days, provided such operation is in compliance with all of the terms and conditions contained in the installation permit. If a Certificate of Operation has not been issued for an emission source prior to the expiration of the trial operation period, an extension of trial operation may be requested of the Division Director.

3. Operation of the emission source shall permanently cease upon denial of the Certificate of Operation by this Division. Denial of a Certificate of Operation is an appealable action pursuant to Section 1401(A) of the Wayne County Air Pollution Control Ordinance, hereinafter "Ordinance", as amended.

4. The applicant shall demonstrate compliance with all Ordinance requirements, other applicable State and Federal air pollution regulation requirements, and with all general and special conditions of this permit prior to the issuance of the Certificate of Operation.

5. The applicant shall not reconstruct, alter, modify, expand or relocate this emission source unless plans, specifications and an application for an installation permit are submitted to and approved by this Division.

6. No emission source shall be operated for any other purpose or in any other manner than that for which the installation permit was approved and for which a Certificate of Operation has been issued unless otherwise authorized in writing by the Division. Such emission source shall also be maintained in a state of good repair to ensure compliance with all Ordinance requirements, other applicable State and Federal air pollution regulation requirements, and with all general and special conditions of this permit.

7. Operation of this emission source shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic

value or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.

8. Operation of this emission source shall not interfere with the attainment or maintenance of the air quality standard for any air contaminant.

9. Operation of this emission source shall not result in significant deterioration of air quality.

10. The applicant shall provide notification of any abnormal conditions or malfunction of process or control equipment covered by this application, resulting in emissions in violation of the Ordinance or of any permit conditions for more than two hours, to the Enforcement Section of this Division. Such notice shall be made as soon as reasonably possible, but not later than 9:00 a.m. of the next working day. The applicant shall also, within 10 days, submit to the Enforcement Section of this Division a written detailed report, including probable causes, duration of violation, remedial action taken and the steps which are being undertaken to prevent a reoccurrence.

11. Approval of this application does not preclude the applicant from complying with any future regulations which may be promulgated.

12. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

13. Act No. 53 - Applicant shall notify any public utility of any excavation, tunneling and discharging of explosives or demolition of buildings which may affect said utility's facilities in accordance with Act 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act.

14. The restrictions and conditions of this installation permit shall apply to any person or legal entity which now or shall hereafter own or operate the emission source for which this installation permit is issued. Any new owner or operator shall immediately notify the Director of the Enforcement Section, in writing, of such change in ownership or principal operator status of this emission source.

15. If the installation, reconstruction, relocation or alteration of the emission source for which this permit has been approved has not commenced within, or has been interrupted for, 18 consecutive months, this permit shall be revoked in writing, with the notice of revocation sent to the applicant by certified mail, unless otherwise authorized by this Division.

16. Except as allowed by Michigan Public Act 451 of 1994, Article II Pollution Control, Chapter 1: Point Source Pollution Control, Part 55 Air Pollution Control, Administrative Rule 285 (a), (b), and (c), applicant shall not substitute any fuels, coatings, or raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by this Division.

SPECIAL CONDITIONS

PROCESS OPERATING RESTRICTIONS

17. Applicant shall comply with all requirements of Part 111 Hazardous Waste Management of Act 451 and any permits issued thereunder.

18. Applicant shall not treat more than 144,000 gallons per day, nor 44,928,000 gallons per year of hazardous wastes, hereinafter "wastes", as received, and as authorized by the Applicant's Michigan Department of Natural Resources, Hazardous Waste Facility Operating License.

19. Applicant shall not accept any wastes and waste categories that are not approved in the applicant's Hazardous Waste Facility Operating License.

20. Applicant may receive, transfer to, and treat in Primary Treatment Tank Nos. 1, 2, 3, and 4 only those wastes which are identified by waste codes approved in the Applicant's Hazardous Waste Facility Operating License.

21. Applicant may store and bulk only those wastes which are identified by waste codes with limitations approved under applicant's Hazardous Waste Facility Operating License.

22. Applicant may store only those wastes which are identified by waste codes approved under the Applicant's Hazardous Waste Facility Operating License.

23. Applicant shall follow procedures for dealing with ignitable, reactive, and incompatible wastes, as defined in the Applicant's Hazardous Waste Facility Operating License.

24. Applicant shall conduct compatibility testing prior to bulking any wastes to determine that there will be no environmentally adverse reactions between the materials which will be bulked.

25. Cyanide wastes shall be stored in a bay of the Container Storage Facility which is totally segregated from the acid waste bays. Acidic wastes shall not be stored in immediately adjacent, or opposite bays. Bays shall be labeled in a highly visible manner.

26. Applicant shall not bulk wastes that have a reactive cyanide content greater than 250 parts per million.

27. Applicant shall not accept F006 or F019 waste material in Primary Treatment Tank Nos. 1, 2, 3, 4 and Secondary Treatment Tank Nos. 18 through 21 with a reactive cyanide content greater than 20 parts per million (ppm).

28. Applicant shall only treat organic waste materials containing higher than cutoff concentrations of Toxicity Characteristic Leaching Procedure (TCLP), volatile and semi-volatile compounds

(TCLP wastes) in Primary Treatment Tank No.3. Such cutoff levels are defined as 30 parts per million (ppm) for volatile TCLP wastes and 30,000 ppm for semi-volatile TCLP wastes.

29. The exhaust gases from Primary Treatment Tank No. 3, when processing above-cutoff-concentration TCLP wastes, shall be sequentially vented through the 500 actual cubic feet per minute (ACFM) caustic scrubber, hereinafter, "Scrubber-3" and then through the Regenerative Activated Carbon Adsorber, hereinafter, "Carbon Adsorber" and then through the 5,000 ACFM caustic scrubber located in the Container Storage Facility, hereinafter, "Scrubber-2". Applicant shall process above-cutoff-concentration TCLP wastes in Primary Treatment Tank No. 3. with Scrubber-3 and the Carbon Adsorber and Scrubber-2 installed and operating properly.

30. The exhaust gases from Primary Treatment Tank Nos. 1, 2, and 4; and Primary Treatment Tank No. 3, when processing below-cutoff-concentration TCLP wastes, shall be vented through the 5000 ACFM caustic scrubber, hereinafter, "Scrubber-1". Applicant shall process below-cutoff-concentration TCLP wastes in Primary Treatment Tank Nos. 1, 2, 3, and 4 with Scrubber-1 installed and operating properly.

31. The organic exhaust gases from the drum wash station shall be vented through the Carbon Adsorber.

32. The inorganic exhaust gases from the Drum Wash station shall be vented through Scrubber-2.

33. The exhaust gases from the Carbon Adsorber shall be discharged through Scrubber-2.

34. Applicant shall not bulk, or transfer any organic waste unless the Vapor Recovery Exhaust and the Drum Unloading Hood exhaust from the Bulk/Transfer Station are vented through the Carbon Adsorber/Scrubber-2 system, which is installed and operating properly.

35. Applicant shall re-install the bung or replace the head immediately after emptying, or removing liquid waste from a drum, unless RCRA-empty or on-site cleaning is required.

36. Applicant shall exhaust the emissions from Tank Nos. 7, 10, 12, 13, 16, 17, 18, 19, 20, and 21 through Scrubber-1.

37. Applicant shall not process any wastes in the Primary or Secondary Treatment Tanks nor store wastes in Tanks No. 7 or 10 unless Scrubber-1 is installed and operating properly.

38. Applicant shall not bulk, or transfer any waste which is not organic, unless the Vapor Recovery Exhaust and the Drum Unloading Hood Exhaust from the Bulk/Transfer Station are vented through Scrubber-2, which is installed and operating properly.

39. Applicant shall operate the lime silos with the fabric filter collector installed and operating properly.

EMISSIONS LIMITATIONS

40. The particulate matter emissions from the fabric filter dust collector shall not exceed 0.004 grain per dry standard cubic foot of exhaust gas, 0.034 pound per hour nor 0.15 ton per year.

41. The total volatile organic compound (VOC) emissions from the Scrubber-2 exhaust shall not exceed 12.60 pounds per hour nor 18.5 tons per year.

42. The total combined VOC emissions from Scrubber-1 and Scrubber-2 shall not exceed 21.5 tons per year.

43. The hydrochloric acid emissions from the Scrubber-1 exhaust shall not exceed 0.016 gram per second nor 0.12 pound per hour.

44. The sulfuric acid emissions from the Scrubber-1 exhaust shall not exceed 0.149 gram per second nor 1.18 pound per hour.

45. The hydrogen cyanide emissions from the Scrubber-1 exhaust shall not exceed 0.02 grams per second nor 0.18 pound per hour.

46. The total combined Hazardous Air Pollutant emissions (HAP - as defined in Clean Air Act Amendments of 1990, Title III, Section 112) from the entire facility shall not exceed 25 tons per year. The emission of any single HAP shall not exceed 10 tons per year.

47. Visible emissions from the fabric filter dust collector shall not exceed five percent opacity.

48. There shall be no visible emissions from Primary Treatment Tank Nos. 1, 2, 3, and 4, or from Scrubber-1, or the carbon adsorber/Scrubber-2 system.

49. There shall be no visible emissions from the operation of the secondary treatment tanks (Tank Nos. 18 through 21).

50. The facility shall comply with Act 451, Part 55, as amended, Administrative Rule 373 for fugitive dust control.

51. Applicant shall clean all paved roadways and parking lots weekly (weather permitting). Cleaning shall utilize an acceptable method, such as vacuum sweeping, or wet sweeping.

CONTROL EQUIPMENT OPERATING PARAMETERS

52. Applicant shall maintain the caustic scrubbing solution in Scrubber-1 at, or above a pH of 10.

53. Applicant shall maintain a minimum packing bed depth in Scrubber-1 of 20 inches of polypropylene packing (Jaeger Tri-Packs or equivalent) material.

54. Applicant shall maintain a pH value of 10, or more for the scrubbing solution in Scrubber-3.

55. The carbon adsorber system shall consist of a carbon bed containing a minimum of 1,800 pounds of activated carbon. Unit shall be equipped with a saturation indicator, i.e., a Flame Ionization Detector (FID) and a control system that automatically switches the process air exhaust to a standby carbon bed prior to breakthrough.

56. Lime Silo fabric filter cloth area shall be a minimum of 180 square feet.

57. The exhaust gas-flow-rate design rating for Scrubber-3 shall be 500 ACFM.

58. The exhaust gas-flow-rate design rating for Scrubber-2 shall be 5,000 ACFM.

59. The exhaust gas-flow-rate design rating for fabric filter collector shall be 1,000 ACFM.

60. The exhaust gases from Scrubber-2 shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 20 inches, at an exit point not less than 70 feet above ground level.

61. The exhaust gases from Scrubber-1 shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 20 inches at an exit point not less than 70 feet above ground level.

RECORD-KEEPING REQUIREMENTS

62. Applicant shall keep a written log of the amount of all the waste processed (treated) and bulked, the corresponding Primary Treatment Tank numbers, and the corresponding waste material analyses for a period of three years following the date of such record and make them available to the Division upon request.

TESTING REQUIREMENTS

63. The Division reserves the authority to conduct, or require any odor testing, or other pollutant testing, at Applicant's facility and at the Applicant's expense. Any required tests shall be performed utilizing methods acceptable to this Division and with prior Division approval.

64. Applicant shall perform stack testing within the trial operating period or at a time mutually agreed upon between the Division and applicant for the compounds listed in Conditions 41 through 46 to verify compliance with the emissions limits specified. Stack testing shall be at the Applicant's expense and with prior approval of this Division. Written notification of the testing shall be given to this Division a minimum of 10 days prior to the testing. A written report containing the testing results and operating data shall be submitted to this Division within 45 days of completion of the testing.

65. After a determination by and a written notification letter from the Division Director that emissions from the facility are causing unreasonable interference with the common public right to live free from foul, or noxious odors, the Applicant shall have an opportunity to meet with the Division to propose a plan of action to abate the odor problem. The scheduled meeting should be held within 10 days of the sending of the Division Director's notification letter. The Applicant shall then have 20 additional days to submit to the Division and to implement an acceptable odor abatement program for permanent resolution of the odor problem. Nothing in this condition shall be considered to diminish the Division's rights to pursue other enforcement actions permitted by law.

Please indicate written concurrence to these special conditions by signing and dating the confirmation copies of this letter by an authorized representative of your organization and returning both copies to this Division by February 10, 1997, retaining the original for your files. We shall approve these permit applications upon receipt of the signed and dated confirmation copies of this letter.

Thank you for your cooperation in this matter.

Very truly yours,

Gregory K. Aldrich

Gregory K. Aldrich
Deputy Director

Enclosures

GKA/kfb:rgp KB
(93124loc.doc)

SIGNATURE F Biermann

NAME F J Biermann

TITLE President

DATE 1-22-97