



Edward H. McNamara
County Executive

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File!

January 8, 1997

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

SUBJECT: AMENDED PERMIT CONDITIONS - AGREEMENT BY COUNTER
SIGNATURE

Dear Mr. Biermann:

C-10026 through C-10032

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)

DEPARTMENT OF ENVIRONMENT - AIR QUALITY MANAGEMENT DIVISION

640 TEMPLE, SUITE 700 • DETROIT, MICHIGAN 48201 • 313-833-7030

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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

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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 recurrence.
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

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(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.

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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.

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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.

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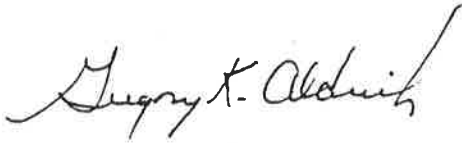
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65. After a determination by and a written notification letter from the Division Director that emissions from the facility are causing unreasonable interference with the common public right to live free from foul, or noxious odors, the Applicant shall 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
Deputy Director

Enclosures

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

SIGNATURE 
NAME F J BIERMANN
TITLE President
DATE 1-22-97