

March 2003



Vol. 43, No. 1

Lake Michigan States Section Air & Waste Management Association Newsletter[®]

The State of the Waste Conference

March 13, 2003

Holiday Inn Select

1801 N. Naper Blvd.

Naperville, Illinois 60563

What's new with waste? Are there requirements that you may be missing? How can you find out and get the biggest bang for your company's buck? By attending this one-day program on **Thursday, March 13, 2003.**

The latest waste topics scheduled to be discussed at this conference include enforcement, TRIs, emergency response, PBTs, shop towel waste, waste manifests and mixed waste revisions, waste management and minimization and case studies. A CD of the conference proceedings will be distributed to attendees at registration.

Opportunities for exhibitors with information on transportation, disposal, emergency response, training and miscellaneous waste issues are available. If you are interested in exhibiting please contact Robin Pelsis at (847) 202-0418 or robin@lmawma.org.

Hazwoper Refresher Course

March 12, 2003

Holiday Inn Select

This 8-hour Refresher Program fulfills the requirement of the OSHA's *Hazardous Waste Operations and Emergency Response Standard*—29CFR 1910.120 and DOT's Shipper/Transporter Standards—49CFR 172.700 & 177.800. Sessions will review and update skills for the protection of employees.

See pages
2 & 3 for
additional
information on
both of these
conferences!

US EPA Extends SPCC Deadlines

*By: Lawrence Fieber, PG
Burns & McDonnell*

The United States Environmental Protection Agency (US EPA), on January 9, 2003, published its interim final rule extending for 60-days all compliance deadlines in 40 CFR 112.3(a) and (b) for facilities to amend their Spill Prevention, Control and Countermeasure (SPCC) Plans. The most immediate deadline for submitting amended plans is thus extended from February 16, 2003 to April 17, 2003.

The 60-day extension also applies to the deadlines for implementing amended Plans. During the period of this sixty-day extension, facilities are not required to file an extension request pursuant to §112.3(f). The interim final rule renders moot any extensions already requested by facilities subject to the rule.

On the same day, US EPA also published its proposed rule to extend for 1 year the compliance deadlines in 40 CFR 112.3(a) and (b). For more information on these changes to the SPCC rules, please visit <http://www.epa.gov/oilspill/> or call the US EPA's RCRA/CERCLA Call Center at 800-424-9346.

Hazwoper Refresher Course

March 12, 2003

Holiday Inn Select, Naperville

The Lake Michigan States Section is pleased to be able to offer an 8-hour refresher training for emergency responders covered by *OSHA's Hazardous Waste Operations and Emergency Response Standard—29CFR 1910.120* and *DOT's Shipper/Transporter Standards—49CFR 172.700 & 177.800*. Personnel covered by these regulations include:

- First responders at the “awareness level” (individuals likely to witness or discover a hazardous substance release and initiate the emergency response)
- First responders at the “operations level” (individuals who respond for the purpose of protecting property, persons or the nearby environment without actually trying to stop the release)
- Hazardous materials technicians (individuals who respond to stop the release)
- Hazardous materials specialists (those who support the technicians but require a more specific knowledge of the substances to be contained)
- On-scene incident commanders (who assume control of the incident scene beyond the “awareness level”)

Experienced instructors from the Labor Extension Program at the University of Illinois' Institute of Labor & Industrial Relations will present a program that includes extensive “hands-on” training. Rather than merely watching videos and instructors who point to equipment, the students will don the appropriate protection, use equipment and personally perform work tasks.

The University of Illinois program has earned a reputation for quality training as it trained over 15,000 people in fifteen years. The strengths of this Hazardous Materials Training Program include experienced instructors, experts in their field and comprehensive curricula. ILIR is affiliated with The Midwest Consortium for Hazardous Waste Worker Training. It is one of the sixteen organizations in the United States funded by the National Institute of Environmental Health Sciences to develop and host these Hazwoper training programs.

The March 12 Hazwoper training will be held in the conveniently located Holiday Inn Select in Naperville. Attendees are invited (but not required) to register also for The State of Waste Conference to be held the following day at the same location.

REGISTRATION FORM Hazwoper & Conference

NAME: _____
COMPANY: _____
ADDRESS: _____
CITY: _____ ST _____ ZIP _____
PHONE: _____ FAX: _____
E-MAIL: _____

To register - mail, fax or
e-mail your registration to:

Robin Pelsis
LM-A&WMA
11 Pleasant Hill Blvd.
Palatine, IL 60067
(847) 202-0418

REGISTRATION:

HazMat Course \$185
 Conference \$160 – Member • \$210 – Non-Member* • \$100 – Gov. Employee • \$50 – Student
Payment via: check cash Visa Mastercard American Express

FAX: (847) 202-0427
E-mail: robin@lmawma.org

Credit Card # _____ Exp. Date: _____

Signature: _____

**Non-member rate includes a one-year local membership*

State of Waste Conference

March 13, 2003

Holiday Inn Select, Naperville

**TRI PBT PCB DEHP UST LUST
ERP OSHA DOT USEPA IEPA CID**

Do you know what these acronyms mean? Test your knowledge. See definitions on page 8.

Don't miss this full-day conference on the full spectrum of waste disposal topics:

Plenary Speaker - Louis M. Halkias

EPA Office of Criminal Enforcement

A real eye-opener! Hear how the Criminal Investigation Division (CID) investigates the most significant and egregious violators of environmental laws. CID refers cases that pose significant risks to human health and the environment for criminal prosecutions. EPA's Criminal Investigation Division (EPA CID) Special Agents are fully authorized law enforcement officers empowered to enforce our nation's environmental laws as well as any other federal laws. These Special Agents bring with them diverse backgrounds and a variety of work experiences.

Revisions to Waste Management & Handling Regulations:

- Waste Manifest Federal Regulation Revisions
- Mixed Waste Federal Regulation Revisions

Emergency Response

- Emergency Security
- One Plan Approach to Emergency Response Plans

TRI Issues

- Air Emissions from Remediation
- Recordkeeping procedures
- New Lead and Lead Compounds Rules

Persistent Bioaccumulative Toxics (PBT)

- Wastes Containing PBT's - Storage and Handling Requirements
- Lighting Waste Management (PBT's)
- Mercury Bulb Storage, Handling & Recycling
- Ballasts Containing PCB (1979) & DEHP (1979-1991)

Shop Towel Waste Management

- Federal Rule Changes
- Waste Handling Options
- Storage and Shipping Requirements

Enforcement & Compliance Assurance

- IEPA Inspector - What they look for.
- What to do when you receive a notice of non-compliance
- What to do when an inspector comes to your door

Waste Minimization

- Waste Reclassification - What do you have to do to officially reclassify your waste from a hazardous waste to a non-hazardous waste?
- Waste generator status - What do you have to do to officially reclassify your generator status. You've reduced your volume, now you have gone from being a large quantity generator to a small quantity generator. What do you do? You don't want to keep doing all that paperwork!

See www.lmawma.org for the full agenda.

LM-A&WMA Calendar of Events

At the recent Annual Planning Meeting the LM-A&WMA Board of Directors developed the following preliminary Calendar of Events for the upcoming year. This schedule promises to provide for an exciting year for the organization with many current issues being addressed. Please feel free to contact **Diana Jagiella** at (309) 999-6309 or djagiella@howardandhoward.com if you wish to participate in the development of any of these programs or if you have a suggestion for future topics. Board of Director meetings are open to all members. Please contact Robin Pelsis at (847) 202-0418 or lm_awma@ameritech.net if you need directions to a Board meeting.

March 11 **LM-A&WMA
Board of Directors Meeting
Burns & McDonnell - 8:00 a.m.**

March 12 **HazMat Refresher Course
Holiday Inn Select
Naperville, Illinois**

March 13 **State of the Waste Conference
Holiday Inn Select
Naperville, Illinois**

March 19 IWWSG Networking Night
Contact: Kimberly Rosha
kar328@hotmail.com

March 28 **LM-A&WMA / ULC Luncheon
Chicago Climate Exchange
Speaker: Michael Walsh**

April 22 **LM-A&WMA / ULC Luncheon
Earth Day Land Revitalization
Speaker: Marianne L. Horinko
U.S. Env. Protection Agency**

April 25 **Annual Section Luncheon Meeting
Athena's Restaurant
Chicago, Illinois**

Volunteer Needed

Want to learn a little about web sites without jumping head first into cyberspace? Maintaining the www.lmawma.org web site is an excellent way to get your feet wet. It only takes one or two hours per month. Coaching will be provided. This is a good way to get familiar with web site design and a great way to get involved with the Lake Michigan States Section.

Interested? For more information contact Tom Tramm at 847-256-3414 or t.tramm@att.net.

2003 Annual Section Membership Luncheon Meeting

**April 25, 2003
Athena's Restaurant
Chicago, Illinois
11:45 a.m.**

Joining us this year will be Mr. Art Spratlin, AWMA President. This is always an enjoyable time for attendees. It offers a chance to hear what A&WMA, as a national organization, is planning, to meet and exchange ideas with the Lake Michigan States Section Board of Directors for the upcoming term, and to learn which students have won the Student Paper Scholarship Awards.

Cost to attend is \$40 for A&WMA members, \$60 for non-members and \$20 for student members. We will again offer the "Introduce a fellow environmental professional to our organization" at a rate of \$45 for guests of members.

To register contact Robin Pelsis at (847) 202-0418 or lm_awma@ameritech.net.

LM-A&WMA and ULC Luncheons

The Lake Michigan States Section of the Air & Waste Management is pleased to announce that it is partnering with the Environmental Committee of the Union League Club to bring its members and guests two very exciting luncheon meeting opportunities.

March 28, 2003

The Chicago Climate Exchange: A Voluntary Greenhouse Gas Pilot Trading and Reduction Program for North America

This presentation will summarize the rationale and mechanics of the Chicago Climate Exchange. The presentation describes the motivations and diversity of market participants, market size and trading features, and the audit and surveillance role of NASD.

Guest speaker will be Michael J. Walsh, Ph.D. Mr. Walsh is Senior Vice President of Chicago Climate Exchange, Inc., a self-regulatory exchange that administers a voluntary greenhouse reduction and trading program for North America.

ULC members should contact the Union League Club directly to make their reservation. For all other, reserve your place at this luncheon by contacting Robin Pelsis at (847) 202-0418 or lm_awma@ameritech.net. Cost to attend this exciting luncheon is \$40 for LM-A&WMA members, \$60 for non-members and \$20 for student members.

April 22, 2003

Earth Day Land Revitalization Roll Out

Marianne Lamont Horinko, the Assistant Administrator for Solid Waste and Emergency Response at the U.S. EPA will roll out the "Land Revitalization Agenda" that expands concepts set forth in the Brownfields law to virtually all U.S. EPA cleanup programs. The Land Revitalization Agenda tackles unintended consequences of some environmental statutes and makes recommendations to assist once-contaminated properties to become competitive for redevelopment.



Her first public announcement will be in Chicago on Earth Day, April 22nd, at the Union League Club. This is an obvious choice for such an announcement, since Chicago has become a model for turning Brownfields from liabilities to community assets. Chicago is on the forefront nationally in the innovative reuse of abandoned and potentially contaminated real estate. The economic, social and environmental advantages of such reuse are well known in the Chicago Community.

ULC members should contact the Union League Club directly to make their reservation. For all other, reserve your place at this luncheon by contacting Robin Pelsis at (847) 202-0418 or lm_awma@ameritech.net.

Cost to attend this exciting luncheon is \$40 for LM-A&WMA members, \$60 for non-members and \$20 for student members.

Title V Compliance Certifications: The More Things Stay the Same, the More They Change

By Bob Wells, Wells Environmental Systems

There is an impending change in Title V permit program procedures for 2003 that could have a big impact on the preparation of annual compliance certifications (ACCs). This procedural shift is not the result of new requirements. Rather, as “major sources” adjust to the requirements of their Title V permits, the level of detail to be managed is being better defined and is increasing. And the ACC is positioned to command a lot of attention, since it is often the only report that is submitted to both the state agency and the U.S. Environmental Protection Agency (USEPA).

The seemingly subtle change in the requirements for ACCs to be submitted in 2003 may create a great deal of work leading up to a sensitive submittal for many Title V permittees, at least in some states. For 2002 ACCs, reported in the spring of 2003, some permittees will now be required to go beyond identifying compliance problems. They will be required to also tabulate all conditions where the facility was in compliance and indicate how they know that they are in compliance.

Among the Lake Michigan States, Illinois and Indiana are requiring that the applicant separately tabulate conditions where compliance was achieved as part of the compliance certification. Michigan and Wisconsin are taking a different approach. In reality, each state’s position and requirements differ in part because of how past decisions

on Title V permit writing interact with current requirements for compliance certifications.

In **Illinois**, form 401-CAAPP has been modified to require that permittees fill out “Table 1” for each requirement of their Clean Air Act Permit Program (CAAPP) Permit (i.e. Title V Permit), *whether or not there was a compliance issue*. The additional information on “deviations” in “Table 2” is required when “noncompliance” or “intermittent compliance” is indicated. As importantly, Illinois Environmental Protection Agency (IEPA) guidance on identifying permit “requirements” has been that the permittee needs to review their permit in detail and identify *requirements* that might not be explicitly stated as permit *conditions*. Then, they need to identify how they are determining compliance status for each of these requirements. That process may be straightforward for a recent MACT standard, but may not be as clear for requirements based on regulations from the 1970s, which were not written to accommodate Title V-style compliance evaluation, but which were included in the permit, often by reference. Certifications are due May 1.

Indiana is taking a similar approach with its Nonrule Policy Document (NPD) on ACCs and its ACC forms. As of this year, permittees will be asked to list compliance status and determination methods for “each item or condition of the permit for which

compliance must be certified” and “the method(s) or other means . . . for determining the compliance status” in tables for “Section C” and “Section D” of the Part 70 (Title V) permit. The requirement has a similar effect as for Illinois, but perhaps an important qualitative difference. Permittees are encouraged to reference permit conditions explicitly, without additional analysis for conditions not explicitly defined by their permits. The basis for compliance can be indicated from a list of data codes if appropriate. Certifications are due April 15 in six specific counties, and July 1 for the rest of the state.

Michigan has developed an approach that is even more heavily based on references to the Renewable Operating Permit or (“ROP” or Title V Permit) for requirements and compliance methods, with only “Deviation Reports” tabulated in detail for those permit conditions without full compliance. Michigan’s ACC form indicates that the ROP documents all “terms and conditions” and “methods used to determine compliance” for compliant conditions, which do not have to be tabulated separately for reporting. However, it is interesting to note that Michigan does recommend that permittees develop a table of requirements similar to Illinois’ “Table 1” and Indiana’s “Sections C and D” as part of their *Life After ROP* permit management guidance.

Continued on page 10

Guidelines for Evaluating Environmental Performance Management Solutions

By: Michael Bounama, Pavilion Technologies, Inc.

Regulations imposed on air pollutant sources are becoming more numerous and overlapping. Because of this, source emissions can be limited in different units (such as total tons per time period and pounds per million Btu) and time bases (such as per year and thirty-day rolling average) Further, limitations on individual units must be managed, as well as limitations on collections of units under cap-and-trade rules.

Current ozone non-attainment regulatory focus is on NO_x, but other programs such as the MACT standards and Compliance Assurance Monitoring (CAM) will add similar requirements in the future. In selecting a comprehensive environmental performance management solution, industry needs to anticipate future real-time monitoring requirements on a number of species currently estimated or otherwise unregulated.

To accommodate future needs, a facility must choose a solution with the capability to seamlessly manage actual measurements of emissions as well as estimated emissions from other monitored parameters using emissions factors and other prescribed methodology.

System Requirements

There are a number of issues inherent in environmental compliance calculations that are difficult to handle natively within existing process data management systems or data historians due to their complexity and the idiosyncrasies of environmental

definitions. These issues call for the purchase or development of a comprehensive environmental management solution to provide the needed functionality.

For instance, a compliant solution might have to:

⇒ **Manage Monitor and Unit Statuses Properly**

Monitor and emission unit statuses are critical components of accurate data handling. These parameters assist in the correct evaluation of mass emissions limits during unit-down conditions and times when emissions data is not being supplied from monitors due to calibration or malfunctions.

⇒ **Calculate Cascades of Averages and Totals Rigorously**

Averages and totals of emissions over different time periods for compliance determination are specified differently by the many different requirements. Typically, a 15-minute average requires at least one good value of fifteen but must use all good values in the period to calculate the 15-minute average. An hourly average can be either the average of two, three or four 15-minute averages depending upon the underlying requirements. After the 1-hour average or total is established, either rolling (overlapping) or block (discrete) averages of longer time periods are required. Some require 30-rolling *operating* day averages and others require 30-rolling *calendar* day totals.

⇒ **Record Regulatory Status of Calculations as Created**

The validity of the emissions data calculated is a function of the operating status of the emission unit and the monitors used to create the emissions data. When creating averages and totals, calculation engines must take into account a myriad of ways to handle emission unit and monitor status flags. Some regulations exempt the emission unit from emission limits during periods of start-up, shutdown or malfunction while others do not. Some regulations require the monitor status to be good for 45 minutes to create a valid 1-hour average while others require 1 good minute to make a 15-minute average and only 2 valid 15-minute periods to create a valid 1-hour average. The examples can go on without end.

⇒ **Facilitate the Prompting and Logging of Reason Code and Corrective Actions**

Once a period of excess emissions or monitor downtime occurs, the reasons for the situation and action to correct the problem must be logged for each period. Traditionally, this has been done using a hand written logbook by operators, followed by the end-of-the-reporting-period reconciliation by the environmental coordinator. The environmental coordinator evaluates the data and then reviews the logbooks and interviews the operators to complete the records and reports. You can imagine the tedium of this process for an organization

Continued on page 11

Illinois Plans Amendments to UST Regulations

By: *Lawrence Fieber, Burns & McDonnell*

The Illinois Office of the State Fire Marshal expects to finalize, in April 2003, the long anticipated amendments to its underground storage tank (UST) regulations (41 Illinois Administrative Code 170). These changes are the result of more than 15 months of deliberation that began in November of 2001. The current draft of the amendments requires all UST owners/operators to modify how they care for their UST systems and requires some UST owners/operators to modify their USTs within 6 months of the effective date of the rule, in order to stay in compliance. In summary, the draft amendments are extensive. A partial listing of the amendments to the UST regulations is as follows:

- Provides new definitions for “Operational Maintenance Inspection”, “Operational Safety Inspections”, “Performance Assurance Inspection”, “Site Assessment”, “Storage Tank Safety Specialist” and others;
- Modifies the list of incorporations by reference;
- Defines the requirements for “out of use” UST systems and extends the period that systems can remain out of use to 5 years, provided that certain criteria are satisfied;
- Requires new and existing systems with impressed cathodic protection to have permanently installed lights and gauges that display operational status and adds significant new requirements to systems with sacrificial anode cathodic protection systems;
- Requires new and replaced spill prevention equipment to have a minimum capacity of 5 gallons and be kept clean and dry;
- Prohibits the use of float vent valves for overfill prevention on certain UST systems;
- Places additional clearance restrictions on new and existing USTs;
- Prohibits new and existing vent piping inside of buildings. Such piping may only remain if approved by OSFM;
- Explicitly states that the security of the UST system is the responsibility of the owner/operator;
- Adds additional requirements to remote fill equipment and piping; and
- Significantly expands UST record keeping requirements.

If you own or operate USTs in Illinois, you should carefully review the planned UST amendments so that your facility is prepared to comply with the new and revised provisions of the UST rules when they go into effect. The draft amendments are available on line at <http://www.state.il.us/osfm/PetroChemSaf/Rules.htm> and the telephone number for the OSFM Office of Petroleum and Chemical Safety is 217-785-1020.

Acronyms

CID	USEPA Criminal Investigation Division
DEHP	di (2-ethylhexyl) phthalate
DOT	US Department of Transportation
ERP	Enforcement Response Policy
IEPA	Illinois Environmental Protection Agency
IEMA	Illinois Emergency Management Agency
LUST	Leaking Underground Storage Tanks
OSHA	Occupational Safety and Health Administration
PBT	Persistent Bioaccumulative Toxics
PCB	polychlorinated biphenyl
TRI	Toxics Release Inventory
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tanks

Send Us
Your News!



LM-A&WMA wants to share your news. Send your announcements of new employees, new location, awarding of a job, etc. to lm_awma@ameritech.net. Your announcement will be included in the next issue of this newsletter. Newsletters are published on a quarterly basis.

Indy 2004 ACE Update

Planning for the A&WMA Annual Conference and Exhibition (ACE) to be held in Indianapolis June 20-24, 2004 continues. The Local Host Committee (LHC) Co-Chair positions have all been filled and many Committees have already begun their planning activities. Dave and Anne continue to talk with potential sponsors and to motivate and support our terrific LHC Co-Chair activities.

On February 12 we took a trip down to Cincinnati and met with staff of the USEPA National Risk Management Research Laboratories. The discussion included sharing of ideas for session/plenary topics and ways for the staff to be involved with the meeting. These opportunities include presenting technical papers at the meeting to "show off their stuff" and also, if budgets are limited, being volunteers by spending half a day as a room monitor and spending the other half of the day attending technical sessions and the exhibition hall for free! After all, Cincinnati is just a short 2-hour drive away.

If your group would be interested in a similar presentation please contact either of us at the information listed. And as mentioned above, we are promoting the ACE and soliciting ideas on regional topics that are of interest to East Central Section and Lake Michigan States Section members. Please feel free to share any ideas with us.

Dave Hoffman and Anne Heighway,
Indy 2004 ACE General Conference
Co-Chairs drhoffmand@aol.com
ahighway@lilly.com
For additional contact names:
www.inawma.org

HELP WANTED

ENVIRONMENTAL ENGINEER

Koch Hydrocarbon, LP Hutchinson, KS

Koch Hydrocarbon Management Company LLC and other Koch affiliates own and/or invest in fractionators and other processing facilities, propane terminals and underground storage facilities, as well as transmission pipelines. This position is located at our fractionator in Hutchinson, Kansas. You will report to the Environmental Manager.

DUTIES/RESPONSIBILITIES:

Manage environmental compliance for our Kansas facilities in Hutchinson and McPherson. Specific duties will include:

- Ensure that the facilities under your direction comply with all applicable laws and regulations as well as meet or exceed the expectations from Koch and the community. (RCRA, SPCC, SWPPP, Title V)
- Manage facility waste management activities.
- Own the facility spill and release reporting and response activities.
- Manage our equipment leak detection and compliance (LDAR) programs.
- Manage our underground injection well and underground cavern storage compliance programs.
- Own the reporting process for your facility and make sure these reports are submitted to the appropriate agencies.
- Determine and implement a self evaluation process at each facility that will proactively identify and resolve issues.
- Provide training to facility employees to ensure compliance.

QUALIFICATIONS:

- 3+ years of industry experience within a petrochemical, chemical or other similar plant facility.
- An engineering degree (chemical, petroleum or environmental)
- Previous experience reading piping and instrumentation diagrams.
- Registered PE preferred.

COMPENSATION/BENEFITS:

We offer competitive wages and benefits packages including relocation assistance commensurate with experience. For additional benefit information, visit us online at www.kochcareers.com.

You can submit your resume to postings@kochind.com. If you have questions, please contact Kristy Smith at the email listed above or toll free at 800-759-5624.

Title V Compliance Certifications (con't.)

However, these are not required to be submitted at this time. Certifications are due March 15.

Wisconsin has developed forms and formal guidance for the first time for this year's ACC; guidance in past years implicitly defaulted to the state's Title V rules. Wisconsin's approach is similar to Michigan, in that the ACC form is based on certifying compliance with all "conditions" based on "the method specified in the permit," except for those explicitly identified in a corresponding deviation report. ACCs were due January 30.

Beyond the differences in recommended procedures and forms, each state has a slightly different approach to what is considered "continuous compliance" or "intermittent compliance" or an "intermittent demonstration of continuous compliance," and there are important distinctions as to whether a "deviation" is a "violation." Also, though all four states now have forms intended for ACC filings, none of them are required; they are actually recommended procedures. Each state's Title V implementing regulation, for which language is based on USEPA's Part 70 regulation, is specified as the underlying requirement. Detailed guidance regarding the Part 70 requirements has not yet been provided by USEPA at the time of this writing, but some differences between state and federal approaches can be inferred from the current Part 70 regulations and past USEPA discussion of Title V requirements.

The process may be the most involved and sensitive in Illinois, where permittees are being asked to independently identify requirements and compliance methods that may not be explicitly stated in the Title V permit. In other states, permittees may be more able to rely on the letter of the permits as the definitive source for applicable requirements and compliance methods. However, the responsibility is ultimately the permittees, and an internal process such as recommended in the Michigan Title V guidance, which is similar to the Illinois ACC filing recommendations, can be valuable in identifying and minimizing compliance risk.

The most important and consistent message to be taken from the recent ACC re-evaluations is that this year's compliance certifications will receive more attention by both state agencies and the USEPA than in the past. Permittees need to have an independent understanding of what is required and how to demonstrate compliance with requirements, combined with a management system that ensures those needs are satisfied. Reporting needs to reflect reality. And regulators need to work with permittees to provide a realistic compliance management response as we all learn to live with Title V.

(Note: detailed references to the forms and/or guidance documents discussed above have been omitted here. These can generally be found on each state's respective Internet web site. The author would be happy to provide clarification if needed, and can be contacted at 630-462-6864 or wellsrobertc@earthlink.net.)

Call for Volunteers

The LM-A&WMA Section is seeking *volunteers* to participate in the following activities:

Environmental Authors: Our LM-A&WMA Board Secretary, Bob Wells, is always looking for talented writers to contribute articles on current environmental issues to the quarterly Lake Michigan States Section Newsletter. If you have interesting information to share from industry, government, academia or consulting, please contact **Bob Wells** at 630-462-6864 or wellsrobertc@earthlink.net.

Open Board Meetings: If you are an interested LM-A&WMA member and would like to become more active or if you would like to present an issue or idea to our Board, come and attend one of our open Board meetings. Contact LM-A&WMA's Admin, **Robin Pelsis**, at 847-202-0418 to find the date and location of the next Board meeting or to be placed on the meeting agenda.

Advisory Committee: Our Section formed an Advisory Committee for our members who are interested in being actively involved with the A&WMA Board and its conference planning activities. If you have such an interest, please contact our LM-A&WMA Board Chair, **Eric Boyd**, at 312-269-8903.

New Members

Due to technical difficulties, the list of new members was not available from A&WMA, at the time of publication. All new members will be listed in our June Newsletter.

Guidelines for Evaluating Environmental (con't.)

with numerous emission units across multiple sites. This methodology is clearly not workable without a significant increasing commitment in human resources. To alleviate the problem, more and more environmental managers are turning to automated systems that allow operators to directly input the reason codes and corrective action text into the process data historian based upon prompts from an environmental performance management system. By employing this type of solution, environmental managers are able to generate compliance reports with the reconciliation performed automatically.

⇒ Automate Data Substitution

The EPA requires each state to implement their own plans to reduce certain emission sources, specifically to require source owners to be accountable for NO_x emissions for 100% of the emissions unit operating time. Under most State Implementation Plans (SIPs), if an emission unit operated but the monitoring data was not available, then data substitution for that period must take place. In order to keep accurate track of NO_x in real-time, an operation must be able to perform this data substitution automatically when true monitor downtime occurs.

⇒ Determine True Environmental Performance in Real-Time

The traditional way to determine true environmental performance was to sift through the numbers and logbooks periodically throughout the reporting period and then create the official records and reports as soon as possible after the end of the reporting period, typically a three

to four week time frame. The traditional way does not facilitate the ability to make quick, knowledge-based operational and market decisions. By determining true environmental performance in real-time operational and market based decisions can be made quickly, decisively and profitably.

⇒ Adding new sources, calculations, caps and other requirements

As regulations change, many solutions on the market today will become obsolete because they are too rigid in their architecture to accommodate the changes. Companies evaluating environmental performance management systems should look for systems that are scalable to add new sources and calculations and to address new cap and other environmental requirements. Customized systems designed just for a state's implementation program and not scalable or useable for other requirements are simply not acceptable.

Make vs. Buy

Once a set of solution requirements and some of the system design issues are identified, it is important to perform a thorough build vs. buy analysis to determine the economic impact of implementing this new technology. Through this process, companies can determine the best decision to achieve their goals. In many cases, the adoption of a commercially available solution has important advantages. Acquisition of a commercial product leverages the experience of large numbers of previous installations, simplifying implementation and avoiding pitfalls. A flexible solution will have the advantage of being off the shelf with

pre-built and tested interfaces to disparate systems and be cost effective in both deployment time and future maintenance.

A Model Solution

One such solution is Envisage™, Environmental Portfolio Manager v3.0 developed by Pavilion Technologies, Inc. Unlike static solutions that require manual data entry and employ tedious error-prone calculation methodologies, Envisage extracts data directly from the source and performs complex, time-intensive calculations in real-time, allowing companies to instantly monitor and forecast environmental performance with pinpoint accuracy. While some commercially available systems employ a "one analyzer-one DAHS" architecture, Envisage layers into existing information structures—providing a comprehensive solution to integrate analyzers, emission factors and other monitored parameters from hundreds of sources into one easy-to-use interface. Envisage saves environmental professionals valuable time by automating data acquisition and handling, allowing their organization to capitalize on market-based emission reduction reforms by monitoring system-wide performance in real-time. By deploying Envisage, industries can manage emissions in real-time with one system while experiencing a low total cost of ownership.

Additional detail on Pavilion's Envisage™, can be obtained from Mike Bounama at: mbounama@pav.com or at www.pavtech.com



Lake Michigan States Section
Air & Waste Management Association
11 Pleasant Hill Blvd.
Palatine, IL 60067

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LAKE MICHIGAN STATES SECTION 2002-03 OFFICERS & DIRECTORS

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Seyfarth Shaw

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LM-A&WMA has been working to update its website. Check us out at www.lmawma.org

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