

Date: May 21, 1996

File Ref:

246004330

Ozaukee

HW/CA

To: Kathy Wolski - DM

From: Mike Griffin - AM

Subject: Public Contact Concerning Odors From Cook Composites and Polymers (CCP)

A meeting was held at the Saukville Village Hall on May 20, 1996 at 6:00 pm. The meeting was requested by Holly and Heidie Hubbel to discuss odor and air pollution emissions emanating from CCP. Christopher Lear, Village Administrator, requested the presence of the WIDNR and CCP company officials. There were approximately 36 people in attendance, many of those who are local residents or employees of CCP. Mr. Lear stated that the intent of this meeting was to set a forum of discussion and exchange of information. This meeting is not a hearing and no minutes will be taken.

The discussion opened with the Hubbels' stating their concern of CCP's request for a 30 month delay in complying with s.NR 421.05 Wisc. Adm. Code and the impact this would have on the continuing odors. CCP responded that there are odors associated with both VOCs and oils (non-VOC's). The variance request is in process and the revised plan is due to the DNR on June 17, 1996. The time to comply with the rule is necessary due to the need to select the best control technology for the company. This technology selection must also meet the requirements of the forthcoming MACT, due in 2007.

Jeffery P. Knight, Village President, stated that he had observed the CCP facility address a number of problems that originated from the former facility, Freeman Chemical. When CCP took over, they took on clean-up efforts. CCP had worked with the Village, WIDNR and USEPA to address remediation of the soil/ground water contamination problem. At this point Mr. Knight had two questions for the WIDNR. The first was why the WIDNR had not been sending him relevant correspondence pertaining to the ground water remediation, as required in the agreement between CCP, Saukville and the WIDNR? The second was will there be a reduction in the odors from CCP when the company complies with RACT in 30 months?

I responded the first question by stating that I was not prepared to address water remediation issues. I agreed to relay this issue to the appropriate section within the WIDNR. (Tim Mulholland - SW/3) I informed Mr. Knight that the Department does not quantify emissions on the basis odor when evaluating compliance with RACT rules. We do evaluate odors on the basis of intensity, duration and frequency, when addressing compliance with the Malodorous Emissions rule. To date, CCP has not exhibited noncompliance with the Malodorous Emissions regulation. With regard to the variance request and controlling VOC emissions, I stated that I am cannot state that there will be a reduction in odors from the CCP facility once they achieve compliance with s. NR 421.05 WI Adm. Code. (85 - 90 % control of process VOC emissions and fugitive emissions monitoring) It is known that atmospheric conditions play a major role in dispersion of air emissions. Odors may be anticipated during times when there is an inversion, when the air emissions will remain at ground level. Mr. Knight then asked if there was anyone at the DNR who could tell him that the odors coming from CCP will be reduced based on their achieving compliance with

the RACT? I responded that I do not believe there is anyone at the WIDNR who could quantify this reduction for him.

The topic then turned to hazardous and toxic air emissions. CCP stated that they are in compliance with the hazardous air pollution control regulations (s. NR 445 Wisc. Adm. Code). The company had modelled the compounds at the fence line and showed they were substantially below the "de minimus" limits. I stated that the intent of s. NR 445 Wisc. Adm. Code was to address hazardous air emissions. There are four tables of listed compounds. Each company that operates in Wisconsin was required to identify which of those compounds they could emit. The next step was to quantify these emissions, potential and actual, and compare the results to the table limits. If they were above the "de minimus levels" a compliance plan was required. CCP has identified which of these compounds they could emit and have submitted the required compliance plans. CCP recently installed control equipment and performed stack testing to verify they are in compliance (phthalic and maleic anhydride emissions). On the basis of my compliance inspections, CCP has shown no evidence of noncompliance with the hazardous air emissions requirements. Mr. Knight asked if the State could be more strict than the USEPA on hazardous emissions? I stated that the State cannot be more stringent than the federal requirements for hazardous air pollutants. I was asked how often does the WIDNR inspect CCP? I responded that I am the air management engineer responsible for this facility and that since 1990, CCP has been inspected five times. I do perform investigations in response to complaints, and have visited CCP a number of times. On average, I visit the facility 2-3 times per year. Other programs also inspect CCP, such as HW, WW, SW, etc.

The meeting was closed at 7:30 pm. I agreed to forward Mr. Knight's comments about the water remediation to the appropriate party. I also agreed to personally inform Mr. Knight of the public hearing for CCP's variance request. This hearing is anticipated to occur in January, 1997.

c: Tim Mulholland - SW/3
Dan Schramm - Air
Jim Chou - AIR

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