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Interoffice Communication

To Ron Bryan
From P. L. Fetzer
Date May 31, 1983
Subject Summary of the Environmental Conference

This meeting was sponsored by the BRAIDG organization with the intent of allowing EPA and state officials to present present policy and future plans on the environmental programs in force in Louisiana. I will summarize as briefly as possible those items covered by each speaker.

A. Water Quality Division - Mr. Dale Givens

1. Water Pollution Regulation

- To be updated and significantly revised.
Inhouse draft to be issued mid to late summer for comments.
- Will adopt standard (limits) for specific toxics.
- Remaining toxics will have a generic type limit, i.e. chlorinated hydrocarbons, volatile organics.
Note: The state will conduct a study along the Mississippi river this summer covering volatile organics and acid extractables, targeting industries that have this potential.
- Discharge limitation will be determined by the state
 - a) Follow BAT and BPT guidelines in setting limits
 - b) No across board % reduction of present limits
 - c) May possibly require biomonitoring semi/annual basis (supposedly data gathering only)
 - d) Consider strongly requiring information on material entering the treatment facility - moving back into the plant so that they know you are doing everything possible to minimize pollution.
- Water bubble concept may be considered.

2. Permits

- Expect compliance 95% of time - limits will be set low enough to insure some exceedance situations.
- Cross over consideration will be made in issuing the permit - just how good is your total environmental record.
- Quality Assurance Requirements will likely be stated in the new permit - possibly a formal laboratory certification program as a requirement.
- Possible allowance of some swings around limits to allow for instrument malfunctions - pH for example.

3. Notification of Exceedance

- Calls must be made to all agencies set forth by law - Some plants are calling the sheriff's department when an exceedance occurs at their secondary facility. Seems unreasonable but is this a current legal requirement? Givens implied that it was a current requirement but somewhat concerned as to where the sheriff's department logs the information, i.e. criminal docket log.

4. Fees

- Prices will go up to help defray expenses of the department as it grows (my interpretation)

B. Air Quality Division - Mr. Gus VonBodungen

1. NESHAPS

- Up for adoption on the 25th, effective date June 20.

2. PSD

- Drafted for some time.
- Using Federal Regulations Guidelines
- Regulation in next 2 or 3 months, however a 2 tier review of this item may cause delay.

3. New Source

- Developed parallel to the EPA guidelines.
- Has been rewritten with rule making within 2 months.
- Jim Anderson (Olin) reviewing the guideline.

4. BACT negotiated between EPA and Companies

- Emission rates agreed to by companies but lower than the BACT levels - state is rewriting permits to agree with BACT performance standards.

5. Emission Reduction Credits

- La. regulations meet the Washington D.C. court decision.
- Non-attainment areas cannot discount emission further.
- State proposed regulations require a 10% reduction in emission.
- Some thought being given to placing a time limitation on banked emission or losing them at some prescribed rate instead of holding them in perpetuity.

6. Odor Regulations

- Guidelines are being circulated now.
- Based on the bay area of California regulations.
- Fence line limit based on butanol method with a panel of 5 people.
- Plan to have an odor van traveling throughout the state, van delivery is scheduled for this summer.

7. Future Regulations

- New source performance standard - isn't this in effect now?
- Acid Rain
 - Studies will be implimented on statewide basis. Two rural and one industrial site will be monitored for 2 years.
- Could not proceed with coal conversion amendment - wiped out - will have to be addressed again.
- SO₂ and NO_x will be cut in the future this may be hard to do.
- Looking at the QAQC programs on all CEMs.
- Conducting at Ozone modling data via monitoring on Mississippi river between Baton Rouge and New Orleans. Other non-attainment areas will be examined later.

8. Section 117 — 17.11?

- Being revised and should be out in 60 days.
- Do what we think is reasonble in the interim.

C. Hazardous Air Pollutants - Mr. Greg Gasperecz (I think Gus is high on this individual)

1. LESHAPS

- Mimics the NESHAPS.
- Effective date June 20, 1983.
- Only those listed are covered - 5 or 6 - others coming will require more effort on part of gov.

2. VCM Standard

- Covered in detail.
- New things - possible.
- Yearly compliance test on incinerator.
- Emission monitoring Eq. - may require daily span and calibrations.
- State may require quarterly reports in lieu of semi annual reports.
- Reporting immediately via phone if over an hour duration or 10 ppm VCM (this is a bit hazy to me).

3. Record Keeping

- Increasing retention time of all records related to emergency release from 2 to 5 years.
Note: This individual seems gunho. Almost as if he would like to nail you if possible.

D. Analytical Investigation Capabilities - Mr. Leonard Medal

Very poor presentation - no real capabilities were presented.

They do have two small vans from Radion Corp.

E. Hazardous Waste Divisions - Mr. Gerald Healy

Good double talker, answers all around the question - politician.

1. RCRA Permits

- State expects to have the authorization to issue the permits sometime around October.
- If we receive a request for part "B" of the permit. Do it in the states' format and cross reference the material for the EPA copy.
- If states gets the program, part "B" will be requested as the state can work the permit - not all at once from everybody, a 180 day notice.
- Be careful of ground water monitoring. Be sure you have good reliable wells. He made the statement that everybody must do ground water monitoring.
- The state stands ready to implement the standard.
States standard must follow Federal guidelines and does, very thick document.
Order of preference:
 1. Try to recover and use the material.*
 2. Destruct and detoxification.
 3. Long term storage
Landfill, deepwell injection, etc.

Delisting material can be done only through EPA. However he stated something about a notification process when state has the program.

- Changing wastes.
- Renotify state of new toxic or old material that should be non toxic.

If exclusions are granted, they refer to a specific site - don't change sites unless new exclusion is granted.

*Requirements of recycable material under new regulation are worst than old regulation.

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F. Role of State Police in Environmental Desiders - Lt. Al Goudeau

- Possible coordinator of effort.
- Can obtain needed equipment (specialized)
- Become involved when hazardous material hits the ground and becomes a hazardous waste.

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