



November 2, 2016

Jonathan Lamb  
Michigan Department of Environmental Quality  
3058 West Grand Boulevard  
Suite 2-300  
Detroit, Michigan 48202

RE: Response to October 14, 2016, Violation Notice; SRN: N0731  
Petro – Chem Processing Group of Nortru, LLC

Dear Mr. Lamb:

This letter is in response to the referenced violation notice. Over the past thirty years Petro Chem Processing Group of Nortru, LLC (Petro Chem) has always strived to operate in accordance with the stipulated language of all applicable permits, licenses, etc... and will continue to do so going forward. We appreciate the positive input by the Michigan Department of Environmental Quality (MDEQ). We believe that we have met the testing, record keeping, and reporting requirements, however the format(s) may have changed or evolved over time. The appropriate information has been collected and is available, just that the presentation and end use may have changed slightly.

We have updated the formats as directed and will assure that moving forward these versions will be used and made available upon request. We have included the information to address the issues listed in the order. They are included as follows:

- Attachment A: FG-CONTROFFLOAD, Containers Processed - Monthly and 12-Month Rolling Time Period;
- Attachment B: FG-CONTROFFLOAD, Monthly average benzene, formaldehyde, and chloroform;
- Attachment C: Permanganate Scrubber – concentration monitoring (twice per operational shift);
- Attachment D: FG-Blending Tanks – Record of last material stored in any tank prior to clean out;
- Attachment E: FG-TruckTransfer – Malfunction Abatement Plan;
- Attachment F: FG-TruckTransfer - Throughput of each specific product each year and 12-month rolling average; calendar;



- Attachment G: FG–TruckTransfer – Monthly record of transfers;
- Attachment H: FGFACILITY – total benzene processed – monthly and 12-monthrolling average;
- Attachment I: Submittal of semi-annual and annual ROP Certifications; and,
- Attachment J: Compliance with 40 CFR Part 61, Subpart DD; 40 CFR Part 61, Subpart EEEE; 40 CFR Part 61, Subpart FF; and, 40 CFR Part 60, Subpart Kb.

If there are any questions and/or comments, please contact me at (313) 824-5432, [allen.jones@stericycle.com](mailto:allen.jones@stericycle.com); or Edward Burk at (313) 824-5840, Ext. 155, [ed.burk@stericycle.com](mailto:ed.burk@stericycle.com).

Sincerely,

**STERICYCLE ENVIRONMENTAL SOLUTIONS**

A handwritten signature in black ink, appearing to read "Allen Jones", with a long horizontal flourish extending to the right.

Allen Jones  
General Manager

enclosures

C: E. Burk, Stericycle



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**ATTACHMENT A**

**FG-CONTROFFLOAD, CONTAINERS PROCESSED  
MONTHLY AND 12-MONTH ROLLING TIME PERIOD**

**Attachment A: FG-CONTROFFLOAD, Containers Processed - Monthly and 12-Month Rolling Time Period**

Nortru, LLC (Nortru) has recorded and tracked the facility throughput since the inception of the on-site operations. Over time the “system” that was used to achieve tracking has been modified, improved and computerized, as most systems have to serve the main end users. This information has and is available for review as part of our electronic tracking system at the facility and in hard copy note books maintained in the on-site laboratory. This includes the total number of containers processed at the facility and subsets such as the number of containers processed in the FG-CONTROFFLOAD area.

We have extracted the information from both of the described locations and “reformatted” the spread sheet(s) as you have requested. This attachment contains the FG-CONTROFFLOAD number of containers processed monthly and also presented as a 12-month rolling time period. As mentioned, this information has always been available, and electronically maintained since 2009, and will also be maintained going forward in the format presented in this attachment.

2016 FG CONTNOFFLOAD - TOTAL NUMBER OF CONTAINER PROCESSED

Material	MONTH												Average per Month
	January	February	March	April	May	June	July	August	September	October	November	December	
Containers	909.0000	364.0000	0.0000	545.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	151.5000

FG -CONTNOFFLOAD  
12 MONTH ROLLING AVERAGE -NUMBER OF PROCESSED CONTAINERS

Material	MONTH													Prior 12 Months Containers /year
	September	October	November	December	Jan-16	February	March	April	May	June	July	August	September	
Containers	0.0007	0.0019	0.0004	0.0006	75.7500	30.3300	0.0000	45.4200	0.0000	0.0000	0.0000	0.0000	0.0000	12.6253

2014												2015												2016														
sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept		
0.00		191.00	727.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	91.00	1473.00	909.00	364.00	0.00	545.00	0.00	0.00	0.00	0.00	0.00	0.00	7.58	122.75	75.75	30.33	0.00	45.42	0.00	0.00	0.00	0.00	0.00



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**ATTACHMENT B**

**FG-CONTROFFLOAD, MONTHLY AVERAGE BENZENE, FORMALDEHYDE, AND  
CHLOROFORM**

**Attachment B: FG-CONTROFFLOAD, Monthly average benzene, formaldehyde, and chloroform**

The same is true for this section as stated for Attachment A. Nortru has recorded and tracked the facility throughput since the inception of the on-site operations. Over time the "system" that was used to achieve tracking has been modified, improved and computerized, as most systems have to serve the main end users. This information has and is available for review as part of our electronic tracking system at the facility and in hard copy note books maintained in the on-site laboratory. This includes the monthly average of benzene, formaldehyde, and chloroform specifically for the FG-CONTROFFLOAD area.

We have extracted the information from both of the described locations and "reformatted" the spread sheet as you have requested. This attachment contains the FG-CONTROFFLOAD, monthly average for benzene, formaldehyde, and chloroform. Again, as mentioned this information has always been available, and electronically maintained since 2009, and will also be maintained going forward in the format presented in this attachment.

2016 FG CONTNROFFLOAD - TOTAL BENZENE, FORMALDEHYDE, CHLOROFORM  
(Megagrams)

Material	Detection Limit	MONTH												Megagrams /year
		January	February	March	April	May	June	July	August	September	October	November	December	
Benzene	0.001	0.0045	ND	ND	0.0208	ND	ND	ND	0.0000	0.0000				0.0253
Formaldehyde	0.01	ND	ND	ND	ND	ND	ND	ND	0.0000	0.0000				0.0000
Chloroform	0.01	ND	ND	ND	ND	ND	ND	ND	0.0000	0.0000				0.0000

ND = Non Detect





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ATTACHMENT C

PERMANGANATE SCRUBBER – CONCENTRATION MONITORING  
(TWICE PER OPERATIONAL SHIFT)

**Attachment C: Permanganate Scrubber – concentration monitoring (twice per operational shift)**

**Potassium Permanganate Monitoring**

At the time of your facility visit (September 19, 2016) we had been using the Permanganate Titrets Test Kits (0.3 -3 %). We had discussed reverting back to the Oxidation/Reduction monitoring method (using the direct read probe) because the Permanganate Test Kits were being discontinued by the manufacture. There was an agreement that the Oxidation/Reduction method could be used until a viable alternative was identified.

All operational days of the scrubber - through 2016 have been monitored (twice a day – before and after the operational shift - and documented with the record maintained in the notebook available in the facility laboratory.

Because we were expecting to extinguish the Permanganate Titrets Kits before the pump room / scrubber operations were halted for the year, we initiated the discussion with you regarding use of the alternate method. We did not have to use the alternate method – operations of the scrubber were halted prior to using up all the Titret Kits. We still have approximately eight of the original Titret Kits. The monitoring information (through the final day of the scrubber operation in 2016) was provided to your office in a previous communication. An additional copy will be supplied, as needed/requested. As the scrubber is utilized, the Titret Kits will be used and then replaced with the proposed kit described below. This is the same manufacture that is providing a replacement for the original Titret Kit.

**Proposed - Potassium Permanganate Monitoring**

Once all of the original test kits have been used, the following method will be employed:

A 0.9 ppm potassium permanganate solution has an “equivalent chlorine concentration” of 1 ppm, so results obtained with one of the free chlorine test kits must be multiplied by 0.9 to convert results from ppm chlorine to ppm potassium permanganate. Since we will / are required to report results in % potassium permanganate, we then divide by 10,000.

We will be using the K-2504 test kit (range 0-1 & 0-5 ppm) with the A-0188 Dilution Kit. To cover the entire 0.3 – 3.0% range, we may use the two different dilutions. The only way to go above 2.25% is with a two-stage dilution (for example, dilute 1:1 and then use one of the micropipettors. Results would have to be multiplied by both dilution factors.).

If the 5000x dilution proves to be sufficient for our needs, we will use the K-2504 kit, the 10  $\mu$ L Minipet® (catalog #A-0192), 50 mL sample cup (A-0588, pack of 6), and the A-0171 tips (pack of 30). Additional refill ampoules can be purchased as R-2504 (30 each).

Please note that we will be using the FREE chlorine procedure and not the total chlorine procedure.

**Conversion of C-2506 Chlorine Comparator Increments for % Potassium Permanganate testing**

C-2506 High range comparator increments (ppm) from K-2504 kit	0.0	1.0	1.5	2.0	2.5	3.0	3.5	4.0	5.0
With 0.9 conversion factor to convert to $\text{KMnO}_4$ (ppm)	0	0.9	1.35	1.8	2.25	2.7	3.15	3.6	4.5
Conversion to % Potassium Permanganate with 1000x dilution using 25 $\mu$ L sample (Orange Minipet) diluted to 25 mL [(result x 0.9 x 1000)/10,000]	0	0.09	0.14	0.18	0.23	0.27	0.32	0.36	0.45
Conversion to % Potassium Permanganate with 5000x dilution using 10 $\mu$ L sample (White Minipet) diluted to 50 mL [(result x 0.9 x 5000)/10,000]	0	0.45	0.68	0.90	1.13	1.35	1.58	1.80	2.25



**ATTACHMENT D**

**FG BLENDING TANKS – RECORD OF LAST MATERIAL STORED IN  
ANY TANK PRIOR TO CLEAN OUT**

**Attachment D: FG-Blending Tanks – Record of last material stored in any tank prior to clean out**

Nortru has always collected and recorded the information to identify the last material type contained in any one respective tank prior to emptying and cleaning. As part of our day-to-day business we require the information to assure proper handling of all the material on-site. This material may be transferred to another blending tank or transported off-site for final disposition (e.g., incineration). For this process to be properly completed we must know the material type – including chemical/physical components of the mixture. This is maintained in our electronic data base.

Going forward we will continue to track and maintain the information as we have been but will also extract the data and have it available for MDEQ review in hard copy form. Very few tanks are emptied and/or cleaned on a yearly-bases, therefore hard copy data accumulation for this section may not be significant



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ATTACHMENT E

FG-TRUCKTRANSFER – MALFUNCTION ABATEMENT PLAN

## **Attachment E: FG –TruckTransfer – Malfunction Abatement Plan**

Included in this attachment is a copy of the Startup, Shutdown, Malfunction & Maintenance Plan (SSM&M) for the Truck Rack. Originally this SSM&M Plan was part of the overall Malfunction Abatement Plan for the Vapor Recovery System. Over time, the Vapor Recovery or Vapor Balancing System has been modified to address the tank system(s) and the truck rack. The primary modifications were completed following the shutdown of the RTO.

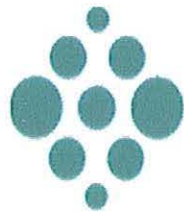
This SSM&M will be maintained, revisited and updated as required.

# STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN FOR THE TRUCK RACK

*Prepared for:*

**Nortru LLC**  
421 Lycaste Road  
Detroit, Michigan

*Prepared by:*



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**TABLE OF CONTENTS**

Background .....2  
Introduction.....2  
Equipment Listing / Applicability .....3  
Maintenance .....5  
Record Keeping .....6  
Monitoring .....6  
Employee Training.....7

**Attachments:**

- A – SSM&M Recordkeeping Logbook
- B – SSM&M Reporting Instructions

TRUCK RACK  
STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN

*October 2016*

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## BACKGROUND

Nortru, LLC (Nortru) is an off-site waste treatment and fuel recovery plant located at 421 Lycaste Road, Detroit, MI. The facility is subject to Standards under 40 CFR Part 63 Subpart DD – National Emission Standards for Hazardous Air Pollutants (NESHAP) from Off-Site Waste and Recovery Operations. As per conditions of the Renewable Operating Permit No. 84-04 B, this facility is required to implement a Startup, Shutdown, Malfunction and Maintenance Plan (SSM&M) for its pumping and consolidation activities as conducted within the Truck Rack.

The Truck Rack has been designed to facilitate the transfer and consolidation of materials while controlling and/or reducing the amount of fugitive emissions as derived from those activities. Fugitive emissions within this area are contained and directed through a vapor balancing system.

This document was prepared to satisfy the requirements of 40 CFR Part 63 Subpart DD and Permit No. MI-ROP-N0731-2009

## INTRODUCTION

Based on the requirements of the Permit To Install, No. 84-04 B and 40 CFR Part 63 Subpart DD, the following SSM&M Plan has been prepared. The primary purpose of this SSM&M Plan is to:

- Ensure that the facility operates and maintains its collection and control system during SSM&M events, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by Subpart DD.
- Correct malfunctions as soon as practicable after their occurrence to minimize emissions
- Reduce the reporting burden associated with periods of SSM&M, and the corrective actions needed to restore the malfunctioning equipment to its normal operation.

SSM&M events must be monitored and recorded for cause, duration, and corrective actions taken, pursuant to 40 CFR Part 63 Sections 63.6 and 63.10. A recordkeeping logbook should be used in documenting each SSM&M event and is included with this Plan (see *Attachment A – Recordkeeping Logbook*).

As per the requirements of 40 CFR Part 63, Section 63.10 of Subpart A requirements, any SSM&M event that occurs must be reported to the state and EPA. Reporting frequency and format requirements are explained at the end of this Plan (see *Attachment B – Reporting Instructions*).

The closed system is operated with no detectable emissions. The closed-vent systems from the affected process vents are vented via a vacuum to the vapor balancing system (VBS). A vacuum pump is used to operate the affected processes and a slight vacuum is also caused by operation of the VBS. Due to this vacuum, any breaks in the closed vent system would cause air infiltration to the system, rather than releases to the atmosphere. Testing of the closed vent system is incorporated as a

TRUCK RACK  
STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN

*October 2016*

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part of the leak testing required under 40 CFR Subpart BB ensuring a minimum annual monitoring. The testing complies with the following requirements:

1. Monitoring complies with Reference Method 21 in 40 CFR part 60.
2. The detection instrument meets the performance criteria of Reference Method 21.
3. The instrument is calibrated in conformance with the standards outlined in 264.1034
4. Performance tests to determine compliance with 264.1032(a) and 264.1033(c) complies with the testing methods outlined in 264.1034.

In accordance with 40 CFR 264.1034, a performance test was conducted to ensure that the was operating at the required control efficiency. The test was conducted to determine compliance with 40 CFR 264.1032(a) using the testing methods outlined in 40 CFR 264.1034.

#### EQUIPMENT LISTING/APPLICABILITY

In conformance with the definitions and standards contained in 40 CFR 264.1051 -264.1062, the following is a general listing of equipment subject to the subpart BB Air Emission Standards:

- Pumps in light liquid service (40 CFR 264.1052).
- Pressure relief devices in gas/vapor service (40 CFR 264.1054).
- Open-ended valves or lines (40 CFR 264.1056).
- Valves in light liquid services (40 CFR 264.1057).
- Flanges and other connectors (40 CFR 264.1058).

Appropriate equipment has been tagged with a unique identification number. However, as maintenance procedures are constantly occurring, this list should not be considered static. This list will be updated as changes occur at the facility. This listing includes the identification required by 40 CFR 264.1050(d) and the information required by 40 CFR 270.25. In general, except for the pressure relief devices, each piece of equipment listed comes into contact with material that has a total organic content exceeding 10% and that the material is in a liquid or flowable state.

1. Specific equipment standards

The procedures that are implemented for each piece of equipment to which the above rules apply are as follows:

- a. Pumps in Light Liquid Service

TRUCK RACK  
STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN

*October 2016*

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Each pump is monitored monthly and the results recorded in accordance with the monitoring procedures. In addition, pumps are visually inspected and the results recorded weekly to assure that there are no leaks from the pump seal.

A leak, or leakage, will be detected when either the monthly monitoring indicates greater than 10,000 ppm of organic air emissions or when the weekly inspection identifies liquid dripping from the pump seal. If a leak is detected, the maintenance procedures will be followed.

b. Pressure Relief Devices in Gas/Vapor Service

Generally the pressure relief devices subject to these standards are pressure/vacuum ("P/V") and emergency relief vents on the tanks in PCPG's hazardous waste tank farms. The *PV* vents are integrated into the emission control system for the tanks, which is comprised of a vapor balance system between the tank and the transport vehicle. The vapor balance lines are permanently installed on the P/V vents on each tank. The opposite end of the vapor balance line is either connected to the transport vehicle or capped. Therefore, any vapor passing through the P/V vent is balanced between the equipment, not emitted to the atmosphere.

Daily inspections are conducted to ensure that the vapor balance lines are capped. Weekly monitoring is conducted and recorded for each P/V vent to assure that, during non-release periods, the vents are operated with no detectable emissions. No detectable emissions will be defined as a reading of not more than 500 ppm above background. Quarterly monitoring is conducted and recorded for each emergency relief vent to assure that, during non-release periods, the vents are operate with no detectable emissions. If a leak is detected, the maintenance procedures will be followed.

c. Open-ended Valves or Lines

All open-ended valves and/or lines have a cap, blind flange, plug or second in-line valve to minimize the potential for releases to the atmosphere. These components are in place at all times except when operations require flow of materials through these lines. In equipment where an in-line valve system is utilized, the valve on the hazardous waste side is closed prior to closing the second valve. Where a double block and bleed system is utilized, the bleed valve is only open when venting of the line is necessary.

d. Valves in Light Liquid Service

All valves subject to these standards are monitored and the results recorded. Initially all valves were monitored on a monthly basis. If a valve has demonstrated two (2) successive months with no leaks, then that valve will be monitored at the first month of each quarter. If a leak is detected, a valve will again be monitored monthly until two (2) successive months of monitoring demonstrates no

TRUCK RACK  
STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN

*October 2016*

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leakage. A leak is identified if, through monitoring, a reading over 10,000 ppm is detected. If a leak is detected, the maintenance procedures specified in Subsection C are implemented.

Some valves are designated as difficult to monitor, in accordance with 40 CFR 264.1057(h); these valves are monitored at least annually. A list of the valves designated as difficult to monitor is included in Emissions Standards.

e. Flanges and Other Connectors

Flanges and connectors subject to this Standard are monitored whenever there is visual, audible, or olfactory evidence of a leak. Monitoring is performed in accordance with the procedures. A leak is identified if, through monitoring, a reading over 10,000 ppm is indicated. If a leak is detected, the maintenance procedures will be followed.

## MAINTENANCE

When a leak has been identified by any of the methods specified above, the following maintenance procedures are implemented for pumps, valves, and flanges or other connectors. The inspector issues a Maintenance Request Form ("MRF") specifying the equipment, location, and conditions requiring attention. The maintenance department, or operator, makes a first attempt to repair the equipment which may include such actions as tightening seals, glands, or bolts or any other action which the maintenance department deems appropriate.

If the first attempt resolves the problem, the MRF is completed and returned for incorporation in the inspection and monitoring log. If the first attempt is unsuccessful, final repair is completed within fifteen (15) days of the original issuance of the MRF and the MRF will be completed and returned for incorporation in the inspection and monitoring log. If any condition prohibits timely repair of the equipment, the Standards for delay of repair contained in 40 CFR 264.1059 are applied.

When a piece of equipment has been determined to have a leak, a weatherproof, clearly visible identification tag is placed on the equipment and the results of monitoring or inspection are logged on the inspection form. The tag includes the equipment number, date of leak determination, and inspector's name. An additional tag indicating the repair date will be placed on valves which are determined to have a leak. This tag may be removed after the equipment has been repaired, except for valves, on which the tags must remain until two (2) consecutive months without leakage have been demonstrated. Repair methods are listed on completed MRF's attached to the inspection forms. Any delay of repairs is noted in the inspection log with appropriate rationale.

October 2016

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### RECORDKEEPING

Emissions Standards contains a listing of equipment subject to these Standards. Also included in this listing are:

- 1) Equipment I.D. Number
- 2) Location of Equipment
- 3) Equipment Type
- 4) Material Percent Organic Content
- 5) Waste State
- 6) Method of Compliance with Standards

Emissions Standards contains the inspection and monitoring logs for the equipment subject to these Standards. During any inspection in which monitoring is to be performed, the inspection sheet includes readings for background levels, regulatory standards, and monitoring results. Inspection logs also contain any MRF's issued and/or completed, as appropriate.

Any equipment listed as unsafe or difficult to monitor is listed with the appropriate rationale for such designation and kept on file in the administrative office. Additionally, a list of the difficult to monitor equipment is presented in Emissions Standards. This list is not a static list due to the constant maintenance procedures taking place at the complex.

### MONITORING

Leak detection monitoring is performed in accordance with 40 CFR 264.1063(b) as required. Emissions Standards contains a copy of reference Method 21 as published by the EPA in its publication entitled Hazardous Waste TSDF - Technical Guidance Document for RCRA Air Emission Standards for Process Vents and Equipment Leaks, Appendix B, July 1990.

\*\* If a malfunction event occurs that is not listed above, this SSM&M Plan should be revised to include that specific type of malfunction.

### **Equipment Maintenance Checklist**

- ✓ Daily leak inspections of all piping and connected equipment.
- ✓ Daily audio/visual inspections on working equipment with emphasis on excessive or unusual noises and obvious or excessive signs of wear on equipment.

**TRUCK RACK**  
**STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN**

*October 2016*

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- ✓ Monthly inspection of all seals and gaskets for leaks and excessive wear.
- ✓ Annual retightening of all accessible bolting and lubrication of all moving parts.
- ✓ Annual leak testing.

**Equipment Maintenance Logging**

The operator should maintain the following information for the VBS.

- ✓ Identification and description of parts or items that are serviced, repaired, replaced, or provided with maintenance.
- ✓ Certificates/recommendations provided by the service or maintenance technician.

**EMPLOYEE TRAINING**

All operators of this equipment should be trained on the proper startup, shutdown, and normal operational procedures which shall include the proper responses relative to malfunctions and all possible major mechanical outages. Training records shall be maintained at this facility.

TRUCK RACK  
STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN

*October 2016*

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ATTACHMENT A

*SSM&M RECORDKEEPING LOGBOOK*



TRUCK RACK  
 STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN  
 Stericycle Detroit  
 October 2016

Each SSM&M event should be recorded in this table. Duplicate this page as needed.

Date	Event (Startup/ Shutdown/ Malfunction/ Maintenance)	Start Time	End Time	Duration	Cause/ Descri ption	Corrective Actions	Did Actions Follow SSM&M Procedures? (YES/NO) If NO, provide details.*	Initials/Date

\* If NO, prepare a full explanation of the event and any corrective action(s) taken. Facility must also revise its SSM&M Plan if it current plan does not include instructions for any SSM&M event that has occurred, or if any corrective actions are taken that are inconsistent with current Plan procedures.

ATTACHMENT B  
*SSM&M REPORTING INSTRUCTIONS*

*October 2016*

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### **Frequency of Reporting**

The SSM&M Plan records should be prepared on a semiannual basis and made available for review upon request by the Agency. If a SSM&M event deviates from the current SSM&M Plan and/or an emission exceedance occurs, the facility should immediately report the event to the State and EPA by phone or fax within two working days from the commencement of any action inconsistent with the Plan. A written report should follow within seven working days of the end of the event. Reports should include all pertinent information as listed below.

### **Semiannual Reporting Format**

The semiannual SSM&M report should include the following information for periods in which a SSM&M occurs and plan procedures were followed. Note that reports are due within 30 days following the end of the semiannual (6-month) period.

- ◆ Contact name
- ◆ Title
- ◆ Certifying signature of official (a sample certification statement is included on the following page)
- ◆ Statement that current SSM&M Plan was followed
- ◆ Copies of any Attachment A – Recordkeeping Logbook Forms, completed for the period.

### **Immediate Reporting Format**

If a SSM&M event deviates from the current plan and/or an emission exceedance occurs, the facility must report exactly what its actions were and/or the type of SSM&M that occurred by phone or fax within two working days after the commencement of any action inconsistent with the Plan. Also, the facility must send a follow-up letter within seven days after the end of the SSM&M event including the following information:

- ◆ Contact name
- ◆ Title
- ◆ Certifying signature of facility plant official
- ◆ How the recent SSM&M happened
- ◆ What was done during the SSM&M
- ◆ The reasons the facility did not follow the current SSM&M Plan
- ◆ Whether any emissions and/or parameters that are monitored (e.g., pressure drop) were higher or different than their allowable values during the SSM&M.

If what was done during a particular SSM&M event was not written in the Plan and/or the type of event was not covered by the current SSM&M Plan, the facility must revise the Plan within 45 days after the SSM&M event to describe what will be done if a similar event occurs again.

TRUCK RACK  
STARTUP, SHUTDOWN, MALFUNCTION & MAINTENANCE PLAN

*October 2016*

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**Certification Statement**

The following certification statement should be included with each SSM&M report:

I certify that the SSM&M information included with this submission is accurate and true to the best of my knowledge and that the current operation and maintenance of the unit is consistent with the procedures contained therein.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature



ATTACHMENT F

FG-TRUCKTRANSFER - THROUGHPUT OF EACH SPECIFIC PRODUCT EACH  
CALENDAR YEAR AND  
12-MONTH ROLLING AVERAGE

**Attachment F: FG – TruckTransfer - Throughput of each specific product each year and 12-month rolling average**

As stated in previous sections, Nortru has recorded and tracked information such as the facility throughput since the inception of the on-site operations. Over time the “system” that was used to achieve the different data tracking has been modified, improved and computerized, as most systems have to serve the main end users. This information has and is available for extraction and review as part of our electronic tracking system at the facility and in hard copy note books maintained in the on-site laboratory. This includes throughput of each specific product by month for a given year at the FG – TruckTransfer area.

We have extracted the information from both of the described locations and “reformatted” the spread sheet(s) as you have requested. This attachment contains the FG - TruckTransfer - Throughput of each specific product each year and also presented as a 12- month rolling time period. As mentioned, this information has always been available, and electronically maintained since 2009, and will also be maintained going forward in the format presented in this attachment.

2016 FG Truck Transfer - TOTAL BENZENE, FORMALDEHYDE, CHLOROFORM  
(Megagrams)

Material	Detection Limit	MONTH												Megagrams /year	
		January	February	March	April	May	June	July	August	September	October	November	December		
Benzene	0.001	0.0073	0.1338	0.0156	0.0425	0.00603	0.00020	0.03	ND	0.0893					0.3267
Formaldehyde	0.01	ND	0.00040	ND	ND	ND	ND	ND	ND	ND					0.0004
Chloroform	0.01	0.03710	ND	ND	ND	ND	ND	ND	ND	ND					0.0371

FG TRUCKTRANSFER  
12 MONTH ROLLING AVERAGE -BENZENE, FORMALDEHYDE,  
(Megagrams)

Material	Detection Limit	MONTH													Prior 12 Months
		September	October	November	December	Jan-16	February	March	April	May	June	July	August	September	Megagrams /year
Benzene	0.001	0.0007	0.0019	0.0004	0.0006	0.0006	0.0055	0.0013	0.0035	0.0005	0.0000	0.0027	0.0000	0.0000	0.0013
Formaldehyde	0.01	0.0000	0.0000	0.0000	0.0000	0.00000	0.00003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.00005
Chloroform	0.001	0.0000	0.0000	0.0000	0.0000	0.0031	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0003

ND = Non Detect

Benzene

2015												2016													
sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	
0.00034		0.00034	0.05521	0.00174	0	0.0074	0.00705	0	0.00101	0.0079	0.1845	0.4426	0.00841	0.0222	0.00516	0.00678	0.0073	0.0416	0.01559	0.0425	0.00603	0.0002	0.03202	0	0
													0.000700833	0.00185	0.00043	0.000565	0.000608	0.003467	0.001299	0.003542	0.000503	0.00002	0.002668	0	0

Formaldehyde

2015												2016													
sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	
0		0	0	0	0	0.0056	0	0	0	0	0	0	0	0	0	0	0.0004	0	0	0	0	0	0	0	
																0	0.00000	0.00003	0	0	0	0	0.0000	0	0

Chloroform

2015												2016													
sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	oct	nov	dec	jan	feb	march	april	may	June	July	aug	sept	
0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0371	0	0	0	0	0	0	0	
																0	0.0031	0.00000	0	0	0	0	0.00000	0	0



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**ATTACHMENT G**

**FG-TRUCKTRANSFER – MONTHLY RECORD OF TRANSFERS**



**Attachment G: FG – TruckTransfer – Monthly record of transfers**

The comments presented for Attachment F holds true for Attachment G.

This attachment contains the FG - TruckTransfer, monthly amount and average transfers for benzene, formaldehyde, and chloroform. Again, as mentioned this information has been available, and electronically maintained since 1909, and will also be maintained going forward in the format presented in this attachment.

2016 FG Truck Transfer - TOTAL TRUCK TRANSFERS

Material	MONTH												Transfers / Year
	January	February	March	April	May	June	July	August	September	October	November	December	
Transfer	184.0	228.0	286.0	258.0	236.0	251.0	246.0	266.0	246.0				183.4

2016 FG Truck Transfer - TOTAL Containers (Volume)

Material	MONTH												Containers / Year
	January	February	March	April	May	June	July	August	September	October	November	December	
Transfer	17880.0	20975.4	25753.4	23966.3	22087.0	23259.4	22759.1	11966.2	12957.7				15133.7



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ATTACHMENT H

FG-FACILITY BENZENE TOTALS

**Attachment H: FG - FACILITY – total Benzene processed – monthly and 12-month rolling average**

Nortru has recorded and tracked the facility total Benzene processed since the inception of the on-site operations. Over time the “system” that was used to achieve tracking has been modified, improved and computerized, as most systems have to serve the main end users. This information has and is available for review as part of our electronic tracking system at the facility and in hard copy note books maintained in the on-site laboratory.

We have extracted the information from both of the described locations and “reformatted” the spread sheet(s) as you have requested. This attachment contains the FG - FACILITY total Benzene processed monthly and also presented as a 12-month rolling time period. As mentioned, this information has always been available, and electronically maintained since 2009, and will also be maintained going forward in the format presented in this attachment.

**2016 FG FACILITY - TOTAL BENZENE, FORMALDEHYDE, CHLOROFORM**  
(Megagrams)

Material	Detection Limit	MONTH												Megagrams /year
		January	February	March	April	May	June	July	August	September	October	November	December	
Benzene	0.001	0.0118	0.1338	0.0156	0.0633	0.00603	0.00020	0.0320	ND	0.0893				0.3520
Formaldehyde	0.01	ND	0.00002	ND	ND	ND	ND	ND	ND	ND				0.0000
Chloroform	0.01	0.00055	ND	ND	ND	ND	ND	0.0001	ND	ND				0.0001

**FG FACILITY**  
**12 MONTH ROLLING AVERAGE -BENZENE**  
(Megagrams)

Material	Detection Limit	MONTH														Prior 12 Months
		September	October	November	December	Jan-16	February	March	April	May	June	July	August	September	Megagrams /year	
Benzene	0.001	0.0007	0.0019	0.0004	0.0006	0.0006	0.0035	0.0013	0.0050	0.0005	0.0000	0.0027	0.0000	0.0000	0.0014	

ND = Non Detect



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**ATTACHMENT I**

**SUBMITTAL OF SEMI-ANNUAL AND ANNUAL ROP CERTIFICATIONS**

## **Attachment I: Submittal of semi-annual and annual ROP Certifications**

As it has been stated in the previous text, we feel that we have collected, recorded and maintained the required information. We have the data input to the on-site electronic database as well as available hard copy located in the on-site laboratory. We have maintained this system to best satisfy the most common end user(s), but have always assured it available for agency review. This system has been in place since at least 2009 and to the best of our knowledge has not been questioned. All of the data reflects operations well within stipulated parameters. Therefore we do not feel there are any deviations to report.

We have taken the initiative to reformat the data/information and presented new spread sheet formats for agency review. We are looking forward to your review and comments. Following any comments received from the MDEQ we will review and incorporate as needed/necessary and make sure that the "MDEQ acceptable" formats will be maintained moving forward.



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**ATTACHMENT J**

**COMPLIANCE WITH 40 CFR PART 63, SUBPART DD; 40  
CFR PART 63, SUBPART EEEE;  
40 CFR PART 61, SUBPART FF; AND, 40 CFR PART 60, SUBPART KB**



**Attachment J: Compliance with 40 CFR Part 63, Subpart DD; 40 CFR Part 63, Subpart EEEE; 40 CFR Part 61, Subpart FF; and, 40 CFR Part 60, Subpart Kb.**

Throughout its operational history, Nortru has always employed a positive working relationship with the U.S. EPA, MDEQ, and other local agencies and officials. We have opened the facility for tours, training exercises, open houses, and an unknown number of audits. We have been forward and direct when asked questions and/or received requests for additional information. Our actions have been consistent with on-going compliance of the stated attitude in Nortru's Source-Wide Permit MI-PTI-N0731-2009, PTI 184-13, PTI 84-04B, and PTI 84-04C, as well as all of the rules and regulations included, or included by reference. This includes the CFR references listed in your communication. We have reviewed the documents and feel that we have and are completing all the applicable elements for maintaining compliance with the referenced applicable conditions.

**Compliance with 40 CFR Part 63, Subpart DD** – as defined in this Subpart the site is a hazardous Air Pollutant (HAP) major source and is licensed as a Treatment, Storage and Disposal Facility (TSDF). All of our defined work areas including tank farms, piping, pumps, etc... are inspected daily. The daily inspection sheets record current conditions, any maintenance records, corrective actions taken, identify defective equipment and record area-specific comments.

All testing requirements such as the monthly test/inspection on the vapor balancing system and the appropriate tank testing/cleaning maintenance and repair activities are recorded, maintained both in an electronic and hardcopy format and are available for review when needed.

If there is a release or an effected source is detected, personnel are properly trained to immediately address the situation and report as required.

As with many of the referenced statues and recorded permits, there is some overlap or duplicative language from one to the next. The combined efforts to address all requirements provides a comprehensive compliance package for operations, maintenance, reporting, record keeping and corrective actions.

**Compliance with 40 CFR Part 63 Subpart EEEE** – as stated the site is a HAP major source and is licensed as a TSDF. It is also by definition under this Subpart an Organic Liquids Distribution (OLD) facility including organic liquid transfer tanks.

As part of the tank and Truck Rack (transfer or loading/offloading rack) a Vapor Balancing System (VBS) was installed. This closed system reduces or eliminates organic emissions. The tanks on site are part of the closed VBS, with emergency release valves associated with each tank. The system is visually inspected every day and vapor pressure tested every month. All observations are recorded on daily inspection sheets and monthly testing reports. All monthly tests conducted to date have reported vapor pressure results (mmHg @ 25 ° C) well within the acceptable range.

During the summer of 2016 the MDEQ utilized the Nortru facility to conduct an exercise in which they used infrared cameras to film the tanks, piping, valves and other associated mechanical PARTS. No leaks were detected.

**Compliance with 40 CFR Part 61, Subpart FF** – The Nortru facility is a Subtitle C Facility (TSDF) with tanks including an on-site treatment process. We run a wide range of analytical parameters on all waste material that is accepted at the site. That is for proper characterization, handling, and documentation for approved waste codes. This extensive analytical testing includes total benzene analyses for both in-coming and out-going loads. As demonstrated by the analytical included in this package our annual total benzene is well below the emission limit of 10Mg/yr.

Following all of our associated written standard operating procedures (SOPs), the industry's best practices and the proper use, maintenance of the VBS helps to assure that we maintain as low as possible of a total benzene emission.

**Compliance with 40 CFR Part 60, Subpart Kb** – by definition under this subpart Nortru is a facility that has on-site tanks that store volatile organic liquids. Therefore we do have and maintain on-site records that present the dimensions, construction details, maintenance records, cleaning schedule, inspections, and any repairs completed on any of the tanks.

The material type and quantity for each tank is constantly monitored. Prior to a tank being emptied and maintenance conducted or the tank is cleaned, a sample of the last material type contained in that tank is sampled and analyzed. The Confined Space (Container Cleaning) SOP documents the sampling/analysis procedure. The information/ results are maintained in our electronic data base and is available for review.