

REGULATORY COMPLIANCE

LEAF does not approach regulatory compliance as a “stand alone” concept, rather, we factor compliance aspects into all phases of work with our clients. Examples of this include our work with clients to develop cost-effective, low intrusion approaches for wood furniture MACT compliance, halogenated solvent MACT compliance, and other projects as described elsewhere. In some instances, however, LEAF is brought in to assist a client that has an existing compliance concern, such as for compliance with an existing permit, or to obtain a permit for a facility that has been operating without a required permit. Our long term professional relationship with state and local regulators combined with our industrial experience enables LEAF to provide successful permit problem resolution for our clients, such as illustrated by the following project summaries.

CLIENT: Coal-Fired Boilers at Woven Apparel Fabric Manufacturer
PROJECT: Obtain Dismissal of Enforcement Actions

This textile manufacturer operates two large coal-fired boilers and is required to conduct biannual stack testing for particulate emissions to demonstrate compliance with the permit limits for particulate matter (PM). On several occasions in the past, the boilers had failed the PM compliance test, and the company received enforcement penalties in addition to Notices of Violation. Recently, LEAF was retained to update the company’s Title V application. While reviewing stack test reports as part of updating the plant’s Title V application, LEAF engineers recognized inconsistencies in the test parameters and emission results. Further investigation and evaluation by LEAF engineers revealed that parameters developed by the stack tester were inconsistent with actual boiler operation. LEAF engineers then conducted thermodynamic assessments to determine the proper parameters, and were able to show that the boilers had not exceeded the permit limits. Engineering documentation developed by LEAF was used to support an appeal of the NOV’s. As a result, the state agency rescinded the violations, and cancelled enforcement action and penalties.

CLIENT: Wood Furniture Manufacturer
PROJECT: Title V Avoidance by Product Substitution

A wood products manufacturer which had been in operation for a number of years contacted LEAF for assistance in evaluating compliance with air quality regulations. Our evaluation indicated that the plant’s emissions in prior years classified it as a major source under Title V, and that it should have applied for an air permit prior to the Title V deadline for that state. LEAF worked with the facility to modify its main manufacturing process, and to replace the use of a hazardous solvent in order to reduce potential emissions below the Title V threshold. LEAF then prepared an air permit application for the plant as a “synthetic minor” source, and worked with the state air quality agency to enable the plant to receive an air permit without penalty for prior years operations without a permit.

CLIENT: Plastic Components Manufacturer
PROJECT: Product Evaluation to Reduce HAP Emissions

While conducting an emission assessment for a client, LEAF engineers observed that emissions of certain HAPs were not consistent with the plant's air permit application. Further evaluation determined that one of the facility's raw product suppliers had substituted a product that did not meet the original specifications, and, as a result, the plant was in violation of its air permit due to actions outside the control of the manufacturing facility. LEAF assisted our client in developing a method to prevent any recurrence, and prepared a defense for the client to present to the air quality agency. Based on the information provided by LEAF, the air quality agency agreed not to pursue any enforcement action.

CLIENT: Thermal Bonded Nonwoven Fabric Manufacturer
PROJECT: Compliance Tracking for Air Toxics

LEAF was retained by this client to develop compliance demonstration procedures and records for the client to use in meeting toxic air pollutant (TAP) emission requirements. LEAF reviewed the facility production records, product MSDS's and product mix formulas to verify actual emissions of TAPs, HAPS, and VOCs. LEAF modified existing data tracking and emission spreadsheets for the client's use in tracking daily usages of targeted TAP-containing products and TAP emissions, and developed report formats that are linked to the existing spreadsheets for ease of compliance reporting.