

FIVE AIR POLLUTION VIOLATIONS

(Handout 2-A)

1. A factory in an older city where much residential development is now located has received a new contract to make supplies for the Department of Defense. They have applied for a change in their Title V permit to increase VOC emissions but cannot divulge the product that is being manufactured. The exhaust vents are at roof top level and on occasion neighbors complain of a sulfur smell. It is believed that the source as already started the new process line without a new Title V permit.
2. A factory just relocated to a small town where no central sewage treatment plant is located. The process they are using has little air emissions out the plant vents or stacks. After the source began operation there appears to be a very heavy smell of VOC from the plants aeration ponds for their wastewater treatment operation. Many nearby residents complain of headaches and stuffy noses and chests. Their Title V permit shows their vent and stack emissions of VOC are well below requirements but show no emissions from their treatment plant.
3. Every year during the fall months, residents of this community experience the pleasure and agony of burning leaves. Many see this ritual as a time of passing from the growing season to the harvest season and find it in keeping with a Thanksgiving tradition. Others find this a time to stay indoors, keep the air conditioning running, and stock up on antihistamines. This community has just enacted a rule that prohibits burning where leaf pick-up is available. Several residents of Jack Street have refused to stop burning and have ignored warning notices issued to ten residents and addresses. Leaf pick-up is available, but has not occurred on the days scheduled for pick-up.
4. A source that is required to continuously monitor their stack emissions has for the past year been reporting almost daily certain periods of excess emissions. In the monthly emissions report, the source reports that these are being caused by startup, shutdown, and malfunction. These types of excess emissions are not considered violations if promptly reported. This source is meeting its reporting requirements except the last two monthly reports have been 10 days late and give no other reasons for the daily reports. The inspector believes that after having reviewed the company's records that the excess emissions are emission violations of both the VE rule and the mass rule due to the poor condition and maintenance problems of the electrostatic precipitator (ESP). The frequent start up and shutdown of the ESP is because of a malfunction of the inner workings of the ESP, caused by poor and improper maintenance and inadequate voltages.
5. The housing redevelopment agency of a medium size city has just awarded a contract to a low bidder for the demolition and removal of several multifamily buildings with approximately 300,000 cubic yards of asbestos laden material. Many losing bidders believe that the contract was bid low because of improper disposal of the material in a non-approved landfill. The contractor started to work about one month later and an inspector scheduled a visit to the demolition site. The inspector found that all the asbestos rules were being met including manifests for an approved landfill in an adjacent state. A week later the inspector remembered to check for the existence of the landfill. No such landfill existed and the manifests were fake.