



Steele CountyXL
Community
Pilot Program
1998

Program Proposal

Steele County Safety Council 1998

Steele County XL Community Pilot Proposal for Final Project Agreement (FPA) Consideration

It is the intent of the Steele CountyXL Direct Participant Project Sponsors to formally apply for a full Community XL Final Agreement to EPA in a community wide project consisting of a Two Phase approach to attainment of Environmental Excellence and Leadership.

Phase I will specifically address industrial regulated wastewater effluent reductions, while at the same time concentrate on significant water use reduction controls. Phase II of the Steele CountyXL Community Program will expand to a multi-media approach to environmental permitting, based on overall community performance, rather than individual member performance in the areas of air emissions, solid waste reduction, hazardous waste reduction, chemical storage and community sustainability.

As a Direct Participant group, we are committed to go beyond existing compliance efforts in order to obtain operating flexibility which will produce results better than what is actually being achieved through current environmental regulatory requirements.

Steele CountyXL intends to develop a community based environmental control system that will set 21st Century Environmental Excellence and Leadership Standards for the rest of the nation to follow.

Steele CountyXL direct participants will follow established criteria through both Phase I and Phase II of this projects proposals in order to document goal progress.

A. Phase I Project Guidelines

1. Environmental Results

- a. This project will encompass the geographic boundaries of Steele County, Minnesota.
- b. Steele CountyXL direct participating industries will commit to cumulative reduction of regulated wastewater effluents, while significantly reducing overall water usage.
- c. Control of regulated wastewater effluents and reduced water usage will have a major economical cost reduction impact for both direct participating industries, as well as the community as a whole. This will provide moneys to further invest in other environmental waste reduction projects. (i.e., Phase 2).

2. Stakeholder Involvement

- a. To formulate effective environmental strategies and economic sustainability, Steele CountyXL will involve the following groups as stakeholders:
 - Minnesota Pollution Control Agency (MPCA).
 - Minnesota Center for Environmental Advocacy (MCEA)

- Steele County Environmental Services.
- Izaak Walton League.
- Green Source 2020.
- Owatonna Chamber of Commerce.
- Steele County Safety Council
- Steele County Community Awareness and Emergency Response (CAER) Organization

3. Economic Opportunity

a. Developing a community Project XL Program will provide the following economic opportunities not only to business and industry, but for the community as a whole:

- Fresh water reduction costs.
- Reduced wastewater treatment costs.
- Energy use reduction.
- Extended life of Owatonna Waste Water Treatment Facilities.

4. Feasibility

a. Technical

- Business sharing technology with other businesses.
- Business sharing technology and information with local government.
- Business will provide leadership to community residents.

a. Administrative

- Creation of a community wide data base which will be accessible via the creation of a Steele CountyXL home page on the web.
- The Steele CountyXL Program administrative body will consist of an executive committee of local industries and stakeholders.

a. Financial

- Financial benefits will be realized to direct participants by water use reduction savings, reduced wastewater treatment costs, reduced regulatory permitting costs and periodic wastewater analysis cost share.

5. Transferability

a. The Steele CountyXL Community Project will serve as a national model of how a community working together and in partnership with the regulatory community can improve and preserve our environment.

6. Monitoring, Reporting and Evaluation

a. Measurable objectives:

- Overall 20% reduction of regulated wastewater effluents.
- The established Green Source 2020 Program, being a neutral third party, will

accumulate industrial wastewater effluent data, preferably by the means of electronic data transfer by Internet access of a developed home page.

- Development and training on establishing a Environmental Management System (EMS) will be offered to all participants, stakeholders and to anyone in the community wishing this type of training to maintain established goals.
- Baseline Wastewater Control Programs will be offered and implemented by all direct participants to maintain consistency from facility to facility.
- All information reflecting this project's progress will either be available through the existing EPA XL web site, or through a local developed home page maintained and administered by Green Source 2020.
- Time line: Wastewater effluent concentrations and program goal progress will be measured at least quarterly.
- Baseline effluent concentration levels will be determined by using historic data available from the Owatonna Waste Water Treatment Facility.

7. Equitable Distribution of Environmental Risks

a. All direct participant industries are entering into this FPA for the following reasons:

- To achieve community environmental excellence and leadership.
- Commitment of knowledge sharing from companies that or who have environmental resources or on-site expertise to assist other community members in addressing problem control areas.
- To partnership with the regulatory community and the stakeholders involved with the Steele CountyXL Community Pilot Program.

8. Community Planning

a. It is the intent of Steele County business and industry to provide leadership roles in setting and attaining future environmental community planning goals.

- As stated in the Steele County Comprehensive Water Plan, 1997 thru 2006, Water Planning Program goals, objectives, actions and priorities, pages 43 thru 58, Steele County XL Community Direct Participants will be involved as actively as possible to assure county residents that the areas of groundwater quality, surface water quality, special land uses and conditions , and related land resources are improved and preserved for for future generations to enjoy.

a. Steele CountyXL Direct Partners realize that without their full cooperation, community future planning goals and achievements will not be possible without hardships to both the community and the business sector.

9. Innovative Approaches / Multi-Media Focus / Pollution Prevention

Cumulative community-wide benefits that would result from the Steele CountyXL Community Pilot program would include the following:

a. **Regulatory flexibility.**

- Multi-media permitting.

- Common sense rules and regulations.
- A better way to comply with existing rules and regulations that will, in fact, achieve a significant reduction in pollution generation and encourage true pollution prevention opportunities.
- A benefit to the community as a whole.

a. Government partnership.

- Remove existing barriers that are counterproductive to both business/industry and governmental regulatory agencies.
- Work together as a team to achieve environmental excellence and develop environmental leadership.
- Share in leadership roles.
- Be creative and innovative.
- Includes local, state and federal agencies.

a. Benefits to business and industry.

- Multi-media permitting.
- Reduction of reporting burdens.
- Economic incentives.
- Information sharing.
- Group problem solving.
- Sharing of technology.
- Mentorship program development.
- Establishment of a community based Environmental management System (EMS).
- Community involvement.

a. Community benefits.

- Community wide environmental sustainability.
- Educational. Natural resource preservation.
- Community involvement/partnerships will provide opportunities for community and business networking.
- Economically beneficial to the community.
- Community participates as stakeholders.

10. Enforcement and Compliance

It is the intention of all the Steele CountyXL Direct Participants to remain within established regulatory enforceable limits, and subject to associated appropriate actions as outlined by existing law. However, as reduction goals are established for superior environmental performance for wastewater effluents, and these reduction goals will be better than what currently is being achieved through existing regulations, then it is our expectation that these goal commitments be considered voluntary, and as such, are not legally binding on participating parties, and could result in EPA to appropriately terminate or modify the existing developed Steele CountyXL Community Pilot Program FPA.

B. Phase II

Phase II of the Steele CountyXL Community Pilot Program will progress towards the following regulated compliance programs, with emphasis being placed on multi-media permitting of Direct Participants in a community umbrella approach. Phase II will not begin until Phase I has made satisfactory progress towards desired goal completion.

1. Air Emissions

Steele CountyXL Direct Participants shall commit to a county-wide reduction of the following air emissions. Reductions shall be based on established historical averages for XL participants.

- a. **VOC's**
 - **Determine present VOC permit levels for XL participants.**
- b. **Particulate Matter**
 - **Make a commitment to control those operations which create a potential particulate matter concern. Control should begin with education and provide availability of Best Available Control Technologies.**
- c. **Hazardous Air Pollutants**
 - **Determine present HAP permit limit levels for XL Direct Participants.**
 - **Provide express commitment to restrict hazardous air pollutant emissions based on existing risk management lists, as well as evaluation of other emissions that are not listed, but may have some level of concern.**

2. Wastes

- a. **Solid Waste**
 - **Assess present level of generation of solid wastes generated by Steele CountyXL Direct Participants.**
 - **Establish guidelines of reduction of generated solid industrial wastes and/or by-products.**
 - **Commitment to evaluate waste reduction or higher value-added opportunities regarding industrial solid waste and/or by-products until such point as continued evaluation appears to be achieving no significant additional results.**
 - **Establish and provide sources of recycling, reclamation and reuse of waste products which are shared and utilized on a county-wide basis.**
- b. **Non-Hazardous Industrial Wastes and/or By-Products**
 - **Commitment to evaluate waste reduction or higher value-added opportunities regarding current generated special waste and/or by-products until such point as continued evaluation appears to be achieving no significant additional results.**
- c. **Hazardous Wastes**
 - **Commitment to continue regular on-site hazardous waste inspections.**
 - **Establish an evaluation program for hazardous waste reductions which may include waste stream combination from or with other XL Direct Participants which will re-categorize generated streams from hazardous to non-hazardous.**

3. Chemical Storage Tanks

- **Develop and implement a Tank Management plan for Steele County XL participants that have chemical storage tanks on-site.**
- **The plans will include on-site tank evaluation and regular inspections, spill prevention measures and structural integrity.**

Steele CountyXL Community Pilot Proposal

Geographic boundary: Steele County, Minnesota

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Direct Participants:

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Gandy Company Uber Tanning

Mustang Mftg. Viracon - Marcon

SPx Corp. OTC Division Steele County

SPx Corp. Power Team Division The King Company

Truth Paint Plant Truth Hardware

Cybex

Scope: Steele CountyXL Direct Participants propose formal Community XL Final Project Agreement (FPA) Consideration for Phase I adoption. Phase I involves a regulatory request to view local wastewater permitted facilities as a single entity with effluent discharge levels being regulated based on mass (pounds per day), rather than being based on concentration, or both.

Justification: Most regulated facilities can maintain permit compliance by both mass and concentration levels, if process changes do not occur. However, if a company chooses to make water use reduction a priority, then the less water used, the more concentrated it becomes. Daily mass discharge levels may not change, but, concentration levels will increase.

I. Beyond Compliance Commitments

A. Direct Participants

In partnership with the MPCA, City of Owatonna Wastewater Treatment Facility and the Stakeholders of Steele CountyXL Community Pilot Program, the Direct Participants will:

1. Determine current wastewater permit discharge levels for all participants within the City of Owatonna.
 - This will be the **established baseline** for all projected reduction commitments.
 - These levels will be totaled and broken down by single regulated component.
2. Set a goal reduction for wastewater contaminates.
 - Target a 20% reduction of regulated effluent discharge contaminates.
 - Reduction total will be based on overall industrial cumulative maximum permitted regulated discharge parameters.
3. Evaluate present permitted totals compared with actual reported totals per past reports kept on file at the Owatonna Wastewater Treatment Facility.
 - This will provide indicators of those participants who may have room for discharge level trading and identify those facilities who have on-going difficulty attaining effluent compliance.
 - This will also indicate, if discharge levels are based on mass rather than concentration, which facilities can reduce overall fresh water usage.
 - Assess wastewater treatment facility operational capacity for handling regulated discharges.

The Owatonna Wastewater Treatment Facility.

- Capacity flow is 5 million gallons per day.
- Projected life span is the year 2004.
- The attached 1996 City of Owatonna Wastewater Treatment Facility Annual Industrial Pretreatment Report includes data from permitted industrial users in Owatonna and specific data from the Owatonna Wastewater Treatment Facility.
 - Note that all regulated parameters for the Owatonna Wastewater Treatment Facility are **well within** federal and state regulatory guidelines. Review of Owatonna Wastewater Treatment Facility NDPEs requirements per federal and state guidelines indicate operational levels for treatment efficiencies of regulated industrial effluents are well within maximum allowable levels for sludge concentrates and incoming effluents:
- Significant water use reduction by business and industry would positively impact daily flow control.
- Influent flow reduction would favorably economically impact the community by extending the projected life span of the existing POTW.

B. Government Partnership Benefits

- Direct Participants will work together to remove existing barriers between business and industry that are counterproductive to achieving beyond compliance commitments by use of the current regulatory system.
- Direct Participants will work together as a team to achieve environmental excellence for the community as a whole.
- Direct Participants will share in local leadership roles.
- Direct Participants will be creative and innovative in strategic planning.

- Direct Participants will work with local, state and federal regulatory agencies.

C. Business and Industry Benefits

- Information sharing.
- Group problem solving.
- Sharing of technology.
- Mentorship programs.
- Establishment of an Environmental Management System (EMS).
- Community involvement.
- Energy use reduction.
- Wastewater treatment cost reduction.
- Freshwater cost reduction.

D. Community Benefits

- Community environmental sustainability.
- Educational program development.
- Natural resource preservation.
- Community involvement and partnerships will provide opportunities for community and business networking.
- The community will be Stakeholders.
- Wastewater treatment cost reduction.
- Extended operating life of City POTW.
- Energy use and cost reduction.

E. Additional Water Related Benefits

1. Stormwater Discharge
 - Establish XL Direct Participant stormwater inspection program.
 - Establish industrial goals and educational programs to reduce stormwater contamination.
2. Well Water
 - Determine XL Direct Participant well water usage.
 - Implement a conservation program to reduce well water usage, as well as to protect aquifer integrity.
 - Commitment to further sanitize well water for drinking water purposes.
 - Participate in well-head protection programs throughout Steele County.
3. Groundwater/Surface Water
 - Initiate a pilot groundwater and surface water evaluation program utilizing private and public governmental agencies to assure reduction of potential groundwater and surface water contamination from XL Direct Participants.

II. Regulatory Flexibility

In exchange for enforceable commitments, Steele CountyXL Community Pilot Direct Participants request regulatory flexibility based on a county wide program, realizing that the initial scope of this programs concentrates on regulated industrial wastewater discharge Industrial Users (IU's) within the City of Owatonna.

Requested regulatory relief includes, but is not limited to:

1. The City of Owatonna Wastewater Treatment Facility (POTW) will continue to administer the approved pretreatment program. The POTW will issue a single permit that encompasses the Industrial Users (IU's) that are direct participants in the Steele County XL Community Pilot Program. The permit will include at least the following provisions:
 - Revised wastewater discharge limits for Industrial Users (IU's).
 - Schedule of compliance to attain an initial 20% reduction in the loading to the POTW.
 - Establishment of monitoring points.
 - Facility compliance audits:
 - Environmental Management System development and implementation.
 - Industrial Users site specific audits.
 - Audit teams will consist of representatives from Industrial Users, government and stakeholders, who will systematically perform compliance assurance audits of each Direct Participant's facility.

If Direct Participants implement on-site wastewater control systems that are measurable, then individual required facility analysis (i.e. quarterly analysis, etc.), be waived and replaced by strategic point source monitoring.

Facility discharge would be tracked by an industrial area main sewer monitoring system. This would include multiple IU's.

Monitor main sewer entering POTW for regulated industrial effluent components.

- Effluent monitoring costs could then be shared by multiple IU's, which would result in significant cost savings for all involved.

A discharge monitoring training system has been developed that will be adopted by all Direct Participants as a control for early detection of potential discharge problems.

- The purpose of this system is to gain a confidence level of acceptance from regulatory authorities.
- Training and implementation of a control system by all XL participants will assure that baseline monitoring requirements are being met.

As conditions change, reduction goals will be evaluated and modified accordingly.

- This will provide necessary adjustments for process changes, facility expansion and/or new business development occurs in Steele County.
- A cooperative effort of communication between local government and Direct Participants will be necessary to assure that the POTW treatment capabilities are not compromised or exceeded.
- It is the intent of the Steele County XL Community Direct Participants to prioritize reduction of regulated effluent discharge in a beneficial manner, not only for themselves, but for the community as a whole.

Reduce regulatory burdens by the creation of a local community group who will assume a defined level of regulatory responsibilities.

- This group will consist of Steele County XL Direct Participants, local government and program stakeholders.
- This will include development and implementation of a tracking system that will verify

compliance activities.

Allow Steele County XL Community Direct Participants to develop and implement local Mentorship Programs that will assist those businesses in Steele County who ultimately will come into the regulatory loop for wastewater effluent compliance.

III. Verification

Steele CountyXL Direct Participants will develop and implement a tracking system that will verify compliance activities, with CommunityXL beyond compliance commitments.

- This system will replace individual reporting requirements that are in place today.
- This system will be measurable and include development of an Environmental Management System (EMS).

IV. Stakeholders

Steele CountyXL Direct Participants have solicited letters of support and partnerships from a variety of local and beyond stakeholders. These include, but are limited to:

a. Direct Participants:

- **Truth Hardware**
- **Cybex**
- **Uber Tanning**
- **Mustang Mftg.**
- **The King Company**
- **Gandy Company**
- **Crown Cork & Seal**
- **SPx Corp. OTC Division**
- **SPx Corp. Power Team Division**
- **Josten's Inc.**
- **Viracon - Marcon**
- **Steele County**
- **Elf Autochem**

a. Stakeholders

- **Steele County**
- **City of Owatonna**
- **Izaak Walton League**
- **Minnesota Pollution Control Agency**
- **Steele County Safety Council**
- **Steele County CAER**
- **Minnesota Center for Environmental Advocacy (MCEA)**
- **Owatonna Chamber of Commerce**

V. Environmental Management System

Steele CountyXL Community Pilot Direct Participants proposes to provide an enforceable commitment to establish and maintain an Environmental Management System which will include regular facility self audits, and that such system will parallel current regulatory enforcement inspections by federal, state and local regulators.

- This will involve Environmental Management System (EMS) training for both direct participants and stakeholders.

VI. Community Technical Resources

- Steele CountyXL Community Direct Participants will develop and establish community technical outreach through existing programs such as Green Source 2020, City and County governments and available State and Federal programs.
- Develop a Community Resource Guide outlining availability of local resources including emergency preparedness, manpower, local expertise and available testing equipment.

Steele CountyXL Community Pilot Executive Committee 1997

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