MINUTES

SEP 18 1981

A meeting of the Wayne County Board of Health was held on Thursday, September 3, 1981 at 10 a.m. in Conference Room "C," 726 City-County Building, Detroit, Michigan.

Board members present were: Commissioner Thomas Presnell, Chairman
Dr. Charles E. Morton, Vice Chairman
Max L. Gardner, M.D.
Mrs. Marie Boyles

Also present were: Dennis J. Dilworth, Public Health Director
John S. Stock, Deputy Director
Vicky Hartingh, Public Health Administrator
Glenn Brown, Director, Environmental Health Division
Alan Greenberg, Meteorologist, Air Pollution Control Div.
Mr. Morton Sterling, Detroit Edison Company
Skiles Boyd, Detroit Edison Company
Bruce R. Maters, Detroit Edison Company
Jerry Minch, Marathon Oil Company
Larry Ohanian, Marathon Oil Company
Richard Szelc, Wayne County Planning Commission

I. APPROVAL OF MINUTES

UPON THE MOTION OF DR. GARDNER, SUPPORTED BY DR. MORTON, THE MINUTES OF THE MEETING OF WEDNESDAY, JULY 29, 1981 WERE APPROVED.

II. EXTENSION OF THE SULFUR-IN-FUEL REQUIREMENTS

Mr. Dilworth introduced Mr. Alan Greenberg of the Air Pollution Control Division. Mr. Greenberg reviewed the material that was presented to the Board relative to the sulfur-in-fuel provisions of the Air Pollution Control Regulation. Mr. Greenberg stated that a request had been received from the Marathon Oil Company to change the restrictions in the sulfur content of No. 6 fuel oil from 1.0% to 1.25 percent and that a request had been received from Detroit Edison requesting that the Board once again suspend the reduction of the sulfur-in-fuel limitations and the corresponding sulfur dioxide exhaust gas concentrations required by the existing regulation.

Mr. Greenberg stated that the Air Pollution Control Division does not recommend the increase requested by the Marathon Oil Company. He then reviewed, in detail, the reasons for such. He said that two air pollution episodes occurred during the Spring of 1981 that resulted in near violation of the 24 hour sulfur dioxide standard and that the modelling carried out by the Detroit Edison Company, relative to its request to the Michigan Air Pollution Control Commission to burn 2.5 percent sulfur coal at its Monroe Power Plant indicated potential violations of the SO_2 standard in Wayne County. Mr. Greenberg clarified the staff report which could give the indication that the Monroe Power Plant is the sole contributor to the model predicted SO_2 violations. The emission inventory used in the model was not restricted to Monroe Power Plant but included sources of SO_2 in Wayne, neighboring Michigan Counties, Ohio and Southwest Ontario. The Monroe

Power Plant was not the sole contributor to the predicted SO_2 violations. In fact, there were other sources that contributed more than the Monroe Power Plant. He stated that the Division will continue to monitor the locations of potential violations and, in the future, would report back to the Board of Health as to whether they would recommend the change in the regulations.

Mr. Ohanian stated that the reasons for the Marathon request involved economics since the Company was having to use more No. 2 oil to mix with the crude since the crude available continues to have higher concentrations of sulfur dioxide.

The Board discussed the Marathon request and,

UPON THE MOTION OF DR. GARDNER, SUPPORTED BY DR. MORTON, DEFERRED ACTION FOR A MONTH ON THE MARATHON REQUEST THAT RESTRICTIONS IN THE SULFUR CONTENT FOR NO. 6 FUEL OIL BE RAISED FROM 1.0 PERCENT TO 1.25 PERCENT.

Mr. Sterling then spoke on behalf of Detroit Edison and emphasized the comments made by Mr. Greenberg relative to the Monroe Power Plant.

UPON THE MOTION OF DR. GARDNER, SUPPORTED BY DR. MORTON, THE BOARD CONCURRED WITH THE REQUEST OF THE DETROIT EDISON COMPANY. UNDER THE PROVISIONS OF SECTION 6.3A9 OF THE WAYNE COUNTY AIR POLLUTION CONTROL REGULATION, THE WAYNE COUNTY BOARD OF HEALTH AUTHORIZED THE SULFUR-IN-FUEL SPECIFICATIONS IN SECTION 6.3A(4) AND EQUIVALENT SULFUR DIOXIDE CONCENTRATIONS IN EXHAUST GAS SCHEDULES IN SECTION 6.3A(6) AS FOLLOWS:

FUEL USE BY	FUEL TYPES	SULFUR IN FUEL PERCENT BY WEIGHT
Electric power plant & central steam generation, including government plants	Other coal Crude & heavy oil Nos. 4, 5, and 6	0.75 1.00
Residential & commercial	Crude & heavy oil Nos. 4, 5, & 6	1.00
All other uses not specified above	Coal Crude & heavy oil Nos. 4, 5, & 6	0.75

Mr. Greenberg then discussed briefly the situation relative to residential coal and,

UPON THE MOTION OF DR. GARDNER, SUPPORTED BY DR. MORTON, THE WAYNE COUNTY BOARD OF

HEALTH AUTHORIZES THE WAYNE COUNTY AIR POLLUTION CONTROL DIVISION TO PERMIT COAL DEALERS TO PURCHASE AND OFFER FOR SALE FOR USE IN WAYNE COUNTY, COALS CONTAINING UP TO 1.0% BY WEIGHT SULFUR CONTENT IN RESIDENTIAL AND COMMERCIAL SPACE AND WATER HEATING APPLICATIONS.

III. REPORT ON PUBLIC HEARING ON CITY SAND AND LANDFILL COMPANY APPLICATION TO THE DEPARTMENT OF NATURAL RESOURCES FOR A SOLID WASTE LANDFILL

Mr. Dilworth stated that he and Mr. Brown had visited the site of the City Sand and Landfill Company. Mr. Stock then reported on the hearing that was conducted by the Department of Natural Resources relative to the request of City Sand and Landfill for an expansion. He stated that major concerns of the people included the truck traffic, the noise, and concern relative to disease. The material that was submitted at the hearing on disease prevalence in the homes around the site was given to Dr. Polkowski for further investigation. Mr. Brown then stated that a decision would be made by the Department of Natural Resources after a 30 day period unless the matter were referred to the Michigan Environmental Review Board.

Mr. Dilworth asked whether the Board would wish to add to the written comments that would be made by the Department in the written records of the Public Hearing. The comments will be distributed at the next Board meeting for further comment.

Mr. Stelg of the Planning Commission, who had been present at the hearing, further commented on it. He stated that there was much concern among the residents about the landfill. He briefly described other landfills in the County which seemed to be operating with little community opposition.

IV. 1980-81 CONTRACT WITH THE MICHIGAN DEPARTMENT OF PUBLIC HEALTH FOR MIC-PRESCAD

Mr. Dilworth reviewed the amendment to the contract between the Health Department and the Michigan Department of Public Health for MIC-PRESCAD for the 1980-81 year. He specifically called attention to the changes from the previous year's agreement.

UPON THE MOTION OF DR. GARDNER, SUPPORTED BY DR. MORTON, THE BOARD APPROVED THE AMENDMENT TO THE AGREEMENT BETWEEN THE MICHIGAN DEPARTMENT OF PUBLIC HEALTH AND THE WAYNE COUNTY HEALTH DEPARTMENT FOR THE DMIC-PRESCAD Project FOR 1980-81 WITH THE UNDERSTANDING THAT SUITABLE ARRANGEMENTS WILL BE MADE TO PROVIDE STATE FINANCIAL SUPPORT FOR THE CLOSEOUT OF THE MIC-PRESCAD PROGRAM THROUGH SEPTEMBER 30, 1981.

V. OLD BUSINESS

None.

VI. NEW BUSINESS

None.

VII. ADJOURNMENT

UPON THE MOTION OF DR. MORTON, SUPPORTED BY MRS. BOYLES, THE MEETING WAS ADJOURNED AT 11:50 A.M.

Submitted by,

Vicky Hartingh

VH/rc

APPROVED: _____

Thomas Presnell, Chairman

DATED: _____

WAYNE COUNTY
AIR POLLUTION CONTROL
REGULATION

WAYNE COUNTY DEPARTMENT OF HEALTH

Merriman Road
Eloise, Michigan 48132

WAYNE COUNTY BOARD OF HEALTH

Frank T. Balaga, M.D.

Kathryn L. McCullough

Paul H. Muske, M.D.

George M. O'Brien, M.D.

Geraldine O'Loan

ARTICLE VI
EMISSION LIMITATIONS AND PROHIBITIONS

Section 6.3 **Emission of Sulfur Compounds.**

Section 6.3A **Fuels and Emissions Relating to Power Generation, Steam Generation, Space Heating, and Service Water Heating.**

1. No person shall cause or permit to be burned fuel whose sulfur content exceeds the sulfur in fuel limitation schedule.

2. No person shall import, sell, purchase, exchange, deliver, store, transport, or offer for sale or exchange, fuel for burning in the County whose sulfur content exceeds the sulfur in fuel limitation schedule.

3. Any person who supplies fuels containing more than 0.5 percent sulfur by weight directly to a user for burning in the County shall keep records of the percent sulfur by weight contained in such fuel by date delivered, quantity, and to whom sold. Such records shall be available for review by the Division.

4. Sulfur in fuel limitation schedule:

EMISSION OF SULFUR COMPOUNDS

		SULFUR IN FUEL, PERCENT BY WEIGHT				
		Effective Date				
Fuel Use By	Fuel Type	Aug. 1, 1972	Aug. 1, 1973	Aug. 1, 1974	Aug. 1, 1975	Aug. 1, 1976
Electric Power plant & central steam generation, including Government plants.	Pulverized Coal	2.50	2.00	1.50	1.25	1.00
	Other Coal	1.00	0.75	0.50	0.50	0.50
	Distillate Oil No. 1 and No. 2	0.30	0.30	0.30	0.30	0.30
	Crude & Heavy oil, No. 4, 5, 6	1.25	1.00	0.70	0.70	0.70
Residential & commercial space and water heating	Coal	0.75	0.50	0.50	0.30	0.30
	Distillate Oil No. 1 and No. 2	0.30	0.30	0.30	0.30	0.30
	Crude & Heavy oil No. 4, 5, 6	1.25	1.00	0.70	0.70	0.70
All other uses not specified above	Coal	1.00	0.75	0.50	0.50	0.50
	Distillate Oil No. 1 and No. 2	0.30	0.30	0.30	0.30	0.30
	Crude & heavy oil No. 4, 5, 6	1.25	1.00	0.70	0.70	0.70

5. No person shall cause or permit a discharge into the atmosphere from any single fuel burning source of emission whatsoever sulfur dioxide in excess of the sulfur dioxide concentration in exhaust gas schedule.

6. Sulfur dioxide concentration in exhaust gas schedule:

EMISSION OF SULFUR COMPOUNDS

SULFUR DIOXIDE IN EXHAUST GAS, PARTS PER MILLION BY VOLUME CORRECTED TO 50 PERCENT EXCESS AIR						
		Effective Date				
Fuel Use by	Fuel Type	Aug. 1, 1972	Aug. 1, 1973	Aug. 1, 1974	Aug. 1, 1975	Aug. 1, 1976
Electric power plant & central steam generation, including Government plants	Pulverized Coal	1400	1100	825	700	550
	Other coal	550	420	280	280	280
	Distillate Oil No 1 and 2	120	120	120	120	120
	Crude & heavy oil, No. 4, 5, 6	500	400	280	280	280
Residential & commercial space and water heating	Coal	420	280	280	120	120
	Distillate Oil No. 1 and 2	120	120	120	120	120
	Crude & heavy oil No. 4, 5, 6	500			280	280
All other uses not specified above	Coal	550	420	280	280	280
	Distillate oil No. 1 and 2	120	120	120	120	120
	Crude & heavy oil No. 4, 5, 6	500	400	280	280	280

7. a. No person shall cause or permit the burning of fuel in any fuel burning equipment having a higher average sulfur content than the fuel burned during the previous twelve (12) calendar months based on a comparable BTU content. For the purpose of determining compliance, the average sulfur content of all fuel and fuels used during each of the calendar months prior to August 1, 1971, shall be determined by averaging the sulfur content of all fuel used during each calendar month on the basis of pounds of sulfur per million BTU's heating value of the fuel or fuels, which shall not be [illegible] month from and after August 1, 1971, when compared with the same calendar month of the previous year, and determined upon the same averaging basis.

   b. The use of fuels having sulfur contents as set forth in the sulfur in fuel limitation schedule shall not allow degradation in the mass rate of particulate emission. The Division may require source emission tests which may be performed by the Division or under its supervision at the expense of the owners of such equipment and may require the submission of reports to the Division both before and after changes are made in the sulfur content in fuel.

8. No person who installs new fuel burning equipment after August 1, 1972 shall cause or permit the emission into the atmosphere of sulfur dioxide exceeding the sulfur dioxide in exhaust gas schedule stipulated for August 1, 1976.

9. If the measured sulfur dioxide air quality in the County meets the necessary Federal ambient air quality standard before implementation of any effective date in Section 6.3A (4) and 6.3A (6), the Board may suspend implementation of any portion of said schedule in whole or in part upon reasonable evidence that failure to implement such supplementary provisions will not compromise achievement and/or maintenance of the secondary Federal ambient air quality standard

Section 6.3B **Exceptions:**

1. The provisions of Section 6.3A (1) and 6.3A (7) (a) shall not apply to any person who has received an installation permit or certificate of operation from the Division on a control device to desulfurize stack gases.

2. The provisions of Section 6.3A (1) shall not apply to any person who uses a combination of fuels in such ratios as to meet the sulfur dioxide in exhaust gas schedule and such person shall procure

written approval from the Division for this exception. The allowable emission will be based on the value in the schedule for the fuel having the higher allowable limit.

3. The provisions of Section 6.3A (2) shall not apply to any person who imports, sells, purchases, delivers, stores, transports, or offers for sale or exchange fuel for burning in the County whose sulfur content exceeds the sulfur in fuel limitation schedule to another person who meets the requirements of Section 6.3B (1), 6.3B (2), or who has received a variance from the Division.

Section 6.3C **Sulfuric Acid Plants:**

1. No person shall cause or permit sulfur dioxide tail gas emissions into the atmosphere from sulfuric acid manufacturing plants to exceed 6.5 pounds per ton of acid produced.

2. No person shall cause or permit sulfuric acid, including sulfur trioxide, emissions into the atmosphere to exceed 0.70 pounds per ton of acid produced

Section 6.3D **Sulfur Recovery Plants:** No person shall cause or permit the emission into the atmosphere of sulfur dioxide, sulfur trioxide, or sulfuric acid from existing sulfur recovery plant to exceed 0.02 pounds per pound of sulfur produced, or 0.01 pounds per pound of sulfur produced from a plant constructed after July 22, 1971

Section 6.3E **Petroleum Refining Activities:** No person shall cause or permit the combustion of any refinery process gas stream that contains hydrogen sulfide in concentration greater than 100 grains per hundred cubic feet of gas without removal of the hydrogen sulfide in excess of this concentration.

Section 6.3F **Hydrogen Sulfide:** When the odor of hydrogen sulfide is found to exist beyond the property line of the source, measurements shall be taken by the method set forth in Section 6.3H (4) and if measured levels of hydrogen sulfide are found to be in excess of 0.005 parts per million by volume for a maximum period of two (2) consecutive minutes, the person causing or permitting such emissions into the atmosphere shall be deemed in violation of this section.

Section 6.3G **Sources Not Specifically Named:** No person shall cause or permit the emission into the atmosphere from any single source gases containing more than 300 parts per million sulfur dioxide nor more than 15 milligrams per cubic meter of sulfuric acid or sulfur trioxide or a com-

bination thereof: Provided however that the foregoing limitations shall not apply to emissions in Section 6.3A through 6.3F.

Section 6. 3H **Methods of Measurement:** Methods for sampling emissions covered in this article shall be as noted below. These methods shall be used as a general guide, but may be modified or adjusted by the Director to suit specific sampling conditions or net ds based upon good practice, judgment. and experience.

1. Sulfur in Fuel Analysis:

   a. Coal: Sampling and analysis of coal ASTM D271.

   b. Oil: Standard method of test for sulfur in petroleum oils ASTM D 1551.

2. Sulfur Dioxide in stack gas analysis: Public Health Service Publication 999-AP13 (1965) Appendix B, p.p. 85-7.

3. Sulfur Trioxide in stack gas analysis: Sulfuric acid in stack gas analysis: Public Health Service Publication 999 AP-13 (1965) Appendix B, p.p. 85-7.

4. Hydrogen Sulfide Analysis: Methylene Blue Method, Stern A. C.. Ed. "Air Pollution." Vol: II, second ed. ,969, p.p. 78-80. As researched by:

   a. M. S. Budd and H. A. Bewick, Analysis Chemical 24, 1536 (1952).

   b. M. B. Jacobs, M. M Braverman and S. Hochhtiser, Analysis Chemical 29, 1349 (1957)