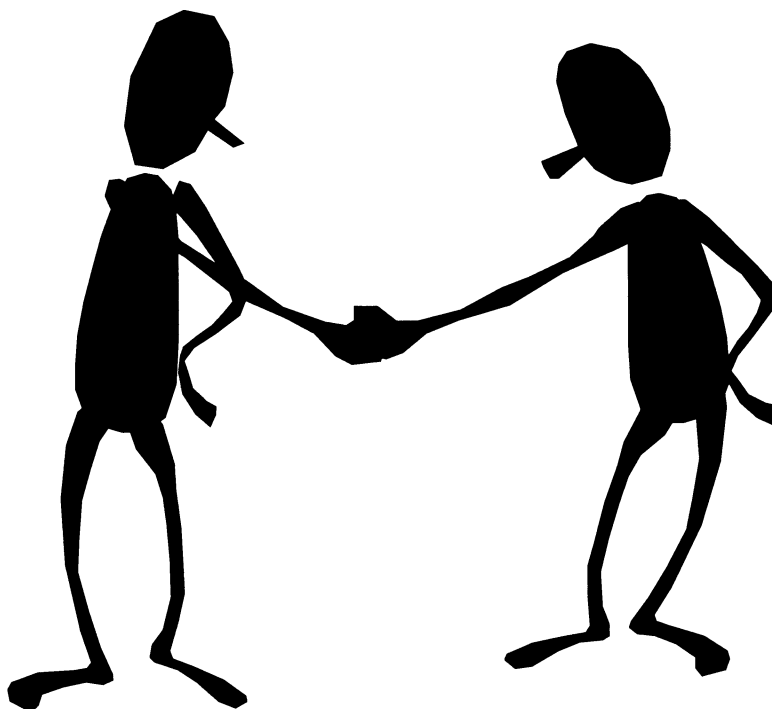


US EPA ARCHIVE DOCUMENT

Steele CountyXL Community Pilot Proposal

Letters of Support 1998





Truth Hardware
700 West Bridge Street
Owatonna, MN 55060

ISO 9001
Certified

Truth Hardware Home Page
<http://www.truth.com>

February 25, 1997

Telephone: 507-451-5620
Accounting Fax: 507-444-5361
Purchasing Fax: 507-444-5335
Sales Fax: 507-451-5655

Mr. Larry Landherr
Regional Manager
Rochester Regional Office
Minnesota Pollution Control Agency
2116 Campus Drive SE
Rochester, MN 55904

Dear Larry,

The following information reflects previous discussions regarding progression towards a Steele CountyXL Wastewater Effluent Control Project:

**Truth Hardware
700 West Bridge Street
Owatonna, MN 55060**

**Facility Contact: Dennis J. Sershen, CHMM
(507) 444-4481
FAX: (507) 444-5380
E-Mail: dsershen@truth.com**

Truth Hardware would like the Minnesota Pollution Control Agency to **consider removing concentration based effluent categorical permit requirements for heavy metals for our two Owatonna facilities and consider permit controls based on mass per day only.**

As are most Owatonna industries, we are very concerned over **excessive water use**. In an effort to be a model corporate environmental leader, we are making every attempt possible to reduce water usage. Unfortunately, reduced water usage generally results in an **increased concentration of regulated effluents. Mass (pounds per day) will not be affected by reduced water usage.**

If business and industry in Owatonna/Steele county are allowed to be regulated by mass based controls, the following benefits will result:

- **Multi-industrial participation with a common cause and willingness to work with local government.**
- **Industry will set goals as a group to reduce levels of permitted contaminants in discharged effluents.**
- **Industry will continue efforts to maximize water usage reduction.**

- **Water conservation** by business and industry will benefit the community economically by increasing the projected life span of the existing wastewater treatment facility. Thus, saving additional millions of dollars to the taxpayers.
- Both residential and commercial expansions could continue at an increased rate if additional wastewater treatment capabilities existed due to **water reduction** efforts by business and industry.
- **Water conservation** efforts would have a positive overall effect on existing and future **natural resources** within the community.
- **Local industry, working as a group, could information share present and future water and permitted effluent control strategies.**
 - * To include problem solving, technological information sharing, mentor those businesses who are having problems with compliance efforts - possibly up to and including pretreatment of small quantities of permitted controlled effluents that they cannot economically afford to pre-treat within their own facility.
- If **government** showed local industry that they are serious in **working together**, as a **team effort**, then business and industry could set **regulated source reduction goals** for effluent discharge collectively as a **community effort**, not just by individual facility.
- In addition to requesting **regulatory flexibility** in order to achieve **environmental excellence and leadership**, Owatonna businesses would partner with other businesses, local governments and the general public throughout Steele County to promote a **multi-media** approach to develop and implement reduction strategies for regulated and voluntary involvement in areas like hazardous waste generation, air emissions, stormwater run-off, solid waste reduction, landfill concerns, surface water contamination, well water contamination, aquifer contamination, develop materials exchange and pollution prevention programs.

It is to be hoped that, this request, along with those of other Owatonna/Steele County facilities, will be enough to **allow our community to progress into a sustainable partnership with regulatory agencies that will result in environmental excellence and leadership.**

If I can be of any additional assistance, please let me know. **Have A Great Day!** ☺

Sincerely,



Dennis J. Sershen, CHMM
 Safety & Environmental Coordinator
 Truth Hardware Corporation



GANDY COMPANY Manufacturers

SINCE 1936, THE GRANULAR APPLICATOR PEOPLE

528 Gandrud Road, Owatonna, Minnesota 55060 U.S.A. 507/451-5430
FAX 507/451-2857 800/443-2476

November 13, 1997

Dean Nelson
Waste Water Treatment Facility
Owatonna, MN 55060

Dear Dean:

This letter is to confirm Gandy Company's intent to be a Direct Participant in the Steele County XL project pending review of the Final Project Agreement for Phase I.

Sincerely,

Dale E. Gandrud
President



king

A United Dominion Company

Flair Air Systems

King
1001 21st Ave. N.W.
P.O. Box 287
Owatonna, MN 55060-1068
Phone 507 451-3770
Fax 507 455-7400

May 14, 1997

Dennis Sershen
Truth Hardware
700 West Bridge Street
Owatonna, MN 55060

Dear Dennis:

We at King are interested in preserving the local environment and concerned about the impact of our effluents transferred to the local wastewater treatment facility. Therefore, we fully support the development the Steele County XL project in an effort to control business wastes at the local level.

With mass-balancing, we believe the treatment plant will be better able to control the pollutant level in the wastewater discharges from Steele County businesses. Mass-balancing and local control will also allow businesses the needed flexibility to manage water usage more effectively.

Please feel free to pass this letter along to the appropriate authorities to show our support for this project.

Sincerely,

Jeffrey R. Lokken
Environmental, Health/Safety Manager

Cc: Bruce Paulson
Bruce Haugen



Owatonna, Southtown

Jostens, Inc-Southtown

1900 Hartle Avenue
Owatonna, MN 55060

Nghi Nguyen
507-455-6539

CC: Rich Svanda
Rick Knoll
Cindy Radel

Southtown is currently regulated on a mass based concentration; a categorical limit for non-ferrous metals. However, because of the technical complexity of the rule, it is difficult for industry to determine with certainty for the various industrial subcategories imposed. The general approach used by the EPA is a "building block" one in identifying and tallying those operational processes within a facility that contribute the wastewater pollutants. Production discharge limits are expressed in terms of mass of contaminant per day (i.e. kg/d). Analyses of wastewater provides data on concentrations of contaminants in mg/l. The appropriate desired mass is calculated by multiplying the appropriate discharge volume by the contaminant concentration. The unusual twisted provision of these regulations is that if a pollutant is not detected, the reported mass discharged is not zero. Rather, it must be reported as the mass calculated by using the method detection limit as the detected concentration. Thus, either a high detection limit for a pollutant or a high wastewater flow can cause exceedance (technical non-compliance) of a standard even when no such pollutant is detected or even processed at the facility. For some instances, the volume discharge reported is higher than the actual discharge amount. This is due to the evaporation through process stacks or other means, which increases the mass discharge reported.

In light of the recent changes in the partnership establishment between Steele County and the MPCA and the Project XL initiative, Jostens-Southtown believes the mass base concentration will allow significant operational flexibility for Jostens and other business/industry in the county. Moreover, single point monitoring, multimedia permitting, and multi-businesses will also contribute to greater flexibility for business and industry.

Regulatory flexibility would need to include a common sense approach that removes all imposed technical barriers acting as a counterproductive to the operation. Jostens-Southtown has committed to become an environmental excellence facility by reducing its waste/wastewater discharge and to become a zero discharge facility except for sanitary waste.

Governmental partnership means turning the regulations into business strategies that truly reflect efforts in achieving pollution reduction and pollution prevention.

The stringent regulations will force business and industry to invest additional capital and effort to become more efficient to attain compliance status. Some changes may be coupled with a huge dollar cost, making them ineffective and economically infeasible.



A division of SPX Corporation
655 Eisenhower Drive
PO Box 995
Owatonna, MN 55060-0995
Phone 507-455-7000, Fax 507-455-7106

March 19, 1997

Mr. Larry Landherr, Regional Manager
Rochester Regional Office
MINNESOTA POLLUTION CONTROL AGENCY
2116 Campus Drive SE
Rochester, Minnesota 55904

Dear Mr. Landherr:

The purpose of this letter is to officially inform the MPCA of the commitment SPX Corporation, Owatonna Tool and Equipment Group (OTEG), 655 Eisenhower Drive, Owatonna, Minnesota intends to make toward the *Steele County XL Wastewater Effluent Control Project*.

The Eisenhower Drive facility currently has concentration effluent limitations based on EPA Categorical Industry, Metal Finishing. We would like the MPCA's consideration in allowing Owatonna's Wastewater Treatment Facility's acceptance of mass based (lbs/day) effluent limitations. This would allow not only our facility, but other interested parties currently regulated in a similar manner to facilitate water conservation projects while maintaining or reducing the level of heavy metals or other contaminants discharged.

Through this letter is the anticipated development of partnerships with regulatory agencies which will allow Steele County businesses to move in the direction of environmental excellence and leadership.

Should you need further information, please contact me direct at 507.455.7249.

Sincerely,

SPX CORPORATION, OTEG

A handwritten signature in cursive script that reads "Darlene Herr".

Darlene Herr
Process/Environmental Engineer



February 27, 1997

Post-it® Fax Note	7671	Date	2-27-97	# of pages	▶
To	DENNIS SERSHEN	From	GAYLORD MOECKLY		
Co./Dept	TRUEN	Co.	MUSTANG MFG. CO.		
Phone #	444-4481	Phone #	451-7112		
Fax #	444-5380	Fax #	451-8209		

Minnesota Pollution Control

RE: Waste Water Discharge

Mustang manufacturing Company would prefer mass based waste water discharge control limits, rather than the present concentration based limits. We have in recent years dropped our water usage from almost 3,000,000 gallons per year to 2,000,000 gallons per year. This has increased our concentration levels. If we were to drop our usage more, our concentration levels could become higher than allowable limits. This is the same concern shared by many of Owatonna's local industries.

Thank you for your consideration.

Gaylord Moeckly
Plant Engineer
Mustang Manufacturing Company, Inc.
(507) 451-7112

UBER TANNING COMPANY

→ Custom Tanners ←

OWATONNA, MINNESOTA 55060

Mr. Larry Landherr
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN

2-26-97

Mr. Landherr:

In conjunction with Owatonna Business and Industry, we support the shift to measure effluent discharge levels on a mass base, rather than the present concentration base permit controls.

Mass base allows water reduction efforts, while at the same time restricts the total amount of regulated pollutants in the waste effluent. With reliance on dilution no longer a factor, we can focus efforts on minimization of the amount of waste, not its concentration.

Reduced flow will also benefit the POTW, with greater life expectancy for equipment. Further, with the constant growth of the City, from residential to the proposed I-35 Museum complex, the finite flow capabilities of the POTW are a real concern. Any reduction of industrial flow will provide the much needed capacity for additional users.

Thanking you in advance for your consideration...

Uber Tanning Company
Harley A. Uber



Cybex International, Inc.

March 3, 1997

Mr. Larry Landherr
Regional Manager
Minnesota Pollution Control Agency
2116 Campus Drive SE
Rochester, MN 55904

RE: STEELE COUNTY XL WASTEWATER EFFLUENT CONTROL PROJECT.

Dear Larry,

This letter is being written for the purpose of asking the Minnesota Pollution Control Agency to consider removing or widening the concentration based effluent categorical permit requirements for heavy metals for Cybex and consider mass per day permitting only. We have worked hard in reducing our waste water consumption, only to find it increases our regulated effluents. Permitting by mass pounds per day would not be effected by reduced water usage. As industry works to improve and maintain environmental qualities in our state, we need the help from your organization and the E.P.A. in allowing industry room to improve some situations of their business by changing another.

Industry in Steele County and Owatonna have the expertise and the resources to operate under mass based controls, and I have several benefits listed below:

- * Local industry and government working together for a common goal.
- * Continued work on water reduction and process improvements.
- * Group goal setting on reduction of discharge effluents.
- * Local group monitoring the program, striving for continued improvement of all environmental conditions and controls.
- * Public knowledge of government and public working together in a team effort.
- * Continued work on the next levels, solid waste haz/waste air emissions and so on.

It is our hope that you will consider our proposal and we look forward to working together on this project. Together we will make Owatonna and Steele County the example the nation needs in showing we can all work together in a team effort to reach a common goal, keeping our environment safe and still maintain a strong industrial community.

Sincerely,

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

Jeff Hollister
Facility Environmental Manager

elf atochem



Elf Atochem North America, Inc.

157 West Highway North, P.O. Box 188, Blooming Prairie, Minnesota 55917
Phone (507) 583-6641, Fax: (507) 583-2804

May 20, 1997

Mr. Dennis Sershen
Safety and Environmental Coordinator
and Steele County Safety Council, President, 1996
Truth Hardware
700 West Bridge Street
Owatonna, MN 55060

RE: Letter of Support

Dear Mr. Sershen:

Viking Chemical Company, a wholly owned subsidiary of Elf Atochem North America, Inc. (Elf Atochem) is committed to conducting its operations in a safe, responsible manner, to minimizing emissions and wastes, and reducing risks to health and the environment through the guiding principles of compliance, protection, and performance. Every employee and agent of Elf Atochem and its U.S. majority-owned subsidiaries is required to uphold these three principles. I believe that these guiding principles are inherent to the Steele County XL Community Pilot Proposal.

Elf Atochem fully supports these principles set forth by the Steele County XL Community Pilot Proposal. These guiding principles are the keys to environmental excellence. As part of our support for the program, Chris Fischer, Manager of Environmental Affairs and Quality Management at our Blooming Prairie Plant, has been an active member of the Steele County XL steering committee.

By way of background, Elf Atochem North America, Inc. is a diversified process chemical manufacturer employing more than 3,500 people nationwide and operates 26 manufacturing facilities in 17 U.S. states. The company is headquartered in Philadelphia, PA, and reports annual sales of just under \$2 billion. Major product/market segments include; commodity organic and inorganic chemicals and chemical intermediates; specialty chemicals, agricultural chemicals, and polymers.

Our Plant in Blooming Prairie employs 55 people with a payroll of approximately \$2,000,000 per year. We purchase locally the equivalent of 40,000,000 bushels per year of soybeans as soybean oil.

We support efforts toward environmental excellence in Steele County.

Sincerely,

A handwritten signature in black ink that reads "Mark J. Heldt". The signature is written in a cursive style.

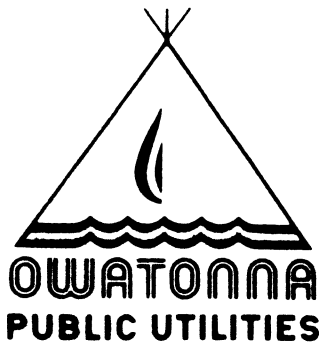
Mark J. Heldt
Plant Manager

cc: J. Feorino Manufacturing Director
C. Fischer Manager, Environmental Affairs and Quality Management

SAMUEL B. PARCELL

General Supervisor Operations

507-451-2839 Ext. 146



208 S. Walnut P.O. Box 800 Owatonna, MN 55060

(507) 451-2480

June 10, 1997

Mr. Dennis Sershen
Steele County XL Program Coordinator
700 West Bridge Street
Owatonna, MN 55060

SUBJECT: Steele County Project XL

Dear Mr. Sershen

Since you recently became a Director of the Steele County CAER Board, you have seen the interest and support shown by the Board concerning the Project XL Program. Your project with MCPA is the type of program that the CAER membership is very much in support of and extend our full cooperation for your effort.

If we can be of assistance in assuring that this program continues, please let me know.

Sincerely,

Samuel B. Parcell
President, Steele County CAER

C: Jerry Rosendahl
Secretary/Treasurer, Steele County CAER

CAUTION CAUTION CAUTION CAUTION CAUTION CAUTION CAUTION CAUTION CAUTION CAUTION

Steele County Safety Council

Owatonna, Minnesota

May 19, 1997

Mr. Dennis J. Serphen
Steele CountyXL Program Coordinator
700 West Bridge St.
Owatonna, MN 55060

RE: Steele CountyXL Community Pilot Program

Dear Dennis,

Consider this a sincere **letter of support** by the Steele County Safety Council for the **Steele CountyXL Community Pilot Program**.

As Chairperson of the Steele County Safety Council XL subcommittee, I know your leadership abilities will result in a Community XL Program that will not only benefit business and industry, but all of Steele County.

Steele County Safety Council will continue to support the efforts of the Steele CountyXL Community Pilot Program and partnership with the Direct Participants and Stakeholders to set national standards for Environmental Excellence and Leadership

Sincerely,



Alan Jenkins
President
Steele County Safety Council 1997



Owatonna Chapter
Izaak Walton League
P.O. Box 9
Owatonna, MN 55060



Dennis Shershen
XL Project
C/O Truth Hardware
700 West Bridge St.
Owatonna, Minn. 55060

Dear Dennis,

The Owatonna Chapter of The Izaak Walton League is supportive of the XL Project, many of the ideals reflect what the Ikes have stood for since the beginning. The Ikes would like to be kept informed on the status of the project and would like to be able to comment on subject matter. I can be contacted at 507-451-7946 or mail sent to me at 146 E. McKinley Owatonna, Minn. 55060 or thru the P.O. Box

Sincerely,

Ted J. Mittelstadt
96-97 Owatonna Chapter President
Izaak Walton League of America

City of Owatonna

OFFICE OF
SUPERINTENDENT
WASTEWATER TREATMENT PLANT

May 15, 1997

Mr Dennis Sershen
Steele County XL Program Coordinator
700 West Bridge Street
Owatonna, MN 55060

RE: STEELE COUNTY XL PROGRAM

Dear Mr. Sershen:

This letter is in support of the Steele County XL Community Pilot Program being proposed to the EPA.

As a stakeholder in the Steele County XL Project, the city of Owatonna supports the efforts of regulated parties to achieve superior environmental performance. Reduction of water usage will extend the life of the Treatment Facility and /or provide room for community growth.

The City of Owatonna is committed to providing an environmentally sound community for residents, businesses, and industries to live and grow.

Sincerely,

Hon. Peter Connor, Mayor

Arnold Putnam, City Engineer

Greg Sparks, City Administrator

Dean M. Nelson, Superintendent

The Chamber

Owatonna Area Chamber of Commerce
320 Hoffman Dr., P.O. Box 331
Owatonna, MN. 55060-0331
Ph: 507-451-7970 - FAX 507-451-7972

May 19, 1997

Mr. Dennis Sershen
Steele County XL Program Coordinator
700 West Bridge Street
Owatonna, MN 55060

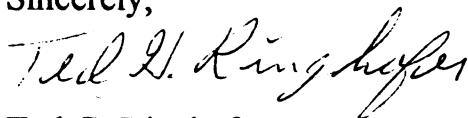
Dear Mr. Sershen:

Project XL is a very innovative and ambitious undertaking for the businesses of Steele County.

As the premier business organization of the area, the Owatonna Area Chamber of Commerce is totally in support of your efforts to measure environmental performance, increase your operational flexibility and bring about a reduction in environmental management costs.

In the past, Steele County businesses have shown a willingness and ability to work together. That cooperative spirit combined with local governments and the regulatory agencies, will make Project XL a great success for Steele County.

Sincerely,



Ted G. Ringhofer
President

TGR/dw



STEELE COUNTY

Board of Commissioners

507-451-8040

Steele County Courthouse
P.O. Box 487
Owatonna, MN 55060



Les Oeltjenbruns - 1st District
L. Dean Christlanson - 2nd District
Jerry Peterson - 3rd District
Howard Heckes - 4th District
Tom Shea - 5th District

April 29, 1997

Mr. Dennis Sershen
Steele County XL Program Coordinator
700 West Bridge Street
Owatonna, MN 55060

RE: Steele County XL Program

Dear Mr. Sershen:

This letter is being sent in support of the Steele County Safety Council's participation in the EPA's XL Program.

As a stakeholder in the community, the Steele County Board of Commissioners support the effort by the local regulated parties to achieve superior environmental performance, increased operational flexibility, and reduced environmental management costs.

By working together, businesses, local governments, and regulatory agencies may achieve greater benefit to the environment with lesser costs than traditional approaches.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Peterson". The signature is written in a cursive style and is positioned above the printed name of the signatory.

Jerry Peterson, Chair
Steele County Board of Commissioners