



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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MEMORANDUM

TO: Regional Directors;
Regional Air Compliance Managers;
Central Office Air Managers;

CC: Jeffrey Steers, Deputy Director of Central Office Operations

FROM: Michael Dowd, Director, Air Division *MD*

SUBJECT: ACG-004:
Guidance for Approval of Existing Sewage Sludge Incineration (SSI)
Operator Training Pursuant to 9VAC5-40 Article 55 and 40 CFR 60
Subpart MMMM

DATE: March 1, 2016

Purpose

The Virginia Department of Environmental Quality (DEQ) is providing this guidance to ensure existing sewage sludge incineration (SSI) unit operators obtain the minimum training and qualification in accordance with Subpart MMMM of 40 CFR Part 60 as adopted by Article 55 of 9VAC5 Chapter 40.¹

Applicability

This guidance is applicable to the approvals for training required by the aforementioned regulations, including the following:

- Initial training/qualification
- Annual refresher/review training

This guidance does not address training required by other regulations.

¹ <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=00d09632638eff6ee3ab6bd163eb6c4d&mc=true&n=pt40.7.60&r=PART&ty=HTML#sp40.7.60.mmmm>
<http://www.deq.virginia.gov/Portals/0/DEQ/Air/Regulations/455.pdf>

Background

The State Air Pollution Control Board (SAPCB) adopted into Article 55 of 9VAC5 Chapter 40 the emission guidelines requirements of Subpart MMMM of 40 CFR Part 60 (Subpart MMMM) on August 15, 2012. Therefore, DEQ is required to develop a state-approved program to approve training and qualification of SSI unit operators (SSI Operator). Specifically, 9VAC5-40-8270 incorporates by reference 40 CFR 60.5130, which states "A SSI unit cannot be operated unless a fully trained and qualified SSI unit operator is accessible..." and that "Operator training and qualification must be obtained through a state-approved program or by completing the requirements..."²

Subpart MMMM goes on to detail specific requirements as follows:

- When the operator training course must be completed (40 CFR 60.5135)³
- How to obtain operator qualification (40 CFR 60.5140)⁴
- How to maintain operator qualification (40 CFR 60.5145)⁵
- How to renew operator qualification (40 CFR 60.5150)⁶

Implementation

DEQ has developed an approval process allowing facilities and training entities to submit their SSI Training and Qualification Package (SSI Package) for review and approval of their training program as follows:

- When to submit the SSI Package:
 - Facilities or their selected instructor(s) must submit their SSI Operator Training and Qualification Package at least 90 Days before the training/qualification course will be delivered to operators.
- Where to submit the SSI Package:
 - Facilities or their selected instructor(s) must submit their SSI Operator Training and Qualification Package to DEQ's Office of Air Compliance and Coordination.⁷
- What to include in the SSI Package:
 - SSI Package Checklist (Attachment 1)
 - SSI Package Document Certification Form (Attachment 2)
 - All appropriate information documenting compliance with the training and qualification requirements of Subpart MMMM

DEQ's review process is iterative with a goal of providing a response within 60 days of receipt. DEQ will discuss incomplete submittals to provide an opportunity for facilities or their selected training entities to provide additional information for approval.

Questions or comments concerning this guidance should be directed to DEQ's Office of Air Compliance Coordination.

² http://www.ecfr.gov/cgi-bin/retrieveECFR?qp=&SID=00d09632638eff6ee3ab6bd163eb6c4d&mc=true&n=pt40.7.60&r=PART&ty=HTML#se40.7.60_15130

³ http://www.ecfr.gov/cgi-bin/retrieveECFR?qp=&SID=00d09632638eff6ee3ab6bd163eb6c4d&mc=true&n=pt40.7.60&r=PART&ty=HTML#se40.7.60_15135

⁴ http://www.ecfr.gov/cgi-bin/retrieveECFR?qp=&SID=00d09632638eff6ee3ab6bd163eb6c4d&mc=true&n=pt40.7.60&r=PART&ty=HTML#se40.7.60_15140

⁵ http://www.ecfr.gov/cgi-bin/retrieveECFR?qp=&SID=00d09632638eff6ee3ab6bd163eb6c4d&mc=true&n=pt40.7.60&r=PART&ty=HTML#se40.7.60_15145

⁶ http://www.ecfr.gov/cgi-bin/retrieveECFR?qp=&SID=00d09632638eff6ee3ab6bd163eb6c4d&mc=true&n=pt40.7.60&r=PART&ty=HTML#se40.7.60_15150

⁷ <http://www.deq.virginia.gov/Programs/Air/PermittingCompliance/Compliance/OfficeofAirComplianceStaffContacts.aspx>

DEQ ACG-004 - Attachment 1

Subpart MMMM SSI Operator Training and Qualification SSI Package Checklist

SSI Operator Training and Qualification Packages must include all of the following information:

Training Agenda

- Course location, date(s), and starting/ending times
- Objective
- Names of trainer(s) and professional background
- Topics (including start/ending times)
- Case studies
- Name and location of any site visits, including travel time

Course Requirements

- Course outline with the appropriate regulatory citations and where each topic may be found (e.g., Inspection and maintenance of the incinerator and air pollution control devices per 40 CFR 60.5130(c)(1)(vi) can be found on Page 6)
- Course description including the following:
 - Each topic and the time dedicated to training for each topic
 - Aspects unique to the facility and addressed in detail (e.g., energy recovery from incinerator or known variations in waste stream)
 - Any case studies
- Initial Operator Training and Qualification Course**
 - The training shall include requirements of 40 CFR 60.5130(c)(1)–(c)(3) at minimum
- Annual Review/Refresher Operator Course**
 - The topics shall include requirements of 40 CFR 60.5145(a)–(e) at minimum

Course Examination and Certification

- Process for confirming identification of operators receiving certification
- Process for confirming that operators receiving certification attended the entire course
- Process for delivering, proctoring, and reviewing the examination
- Location of examination and name of proctor
- Proposed examination
- Proposed examination cover page documenting SSI Operator experience (See example in Attachment 4)
- Criteria for passing/certification administered by the trainer (i.e., 70% correct out of a minimum of 25 total questions)
- Process for issuance of certification by trainer to SSI Operators to be certified
- Details on what is provided to certified SSI Operators (should include at least the following):
 - Copies of the presentations and reference materials
 - A copy of the approval letter for the course
 - A copy of the completed exam with cover page documenting SSI Operator experience
 - A certificate (see example in Attachment 3) providing the name of the operator, the date of completion, stating the operator completed (initial or refresher) "Sewage Sludge Incineration (SSI) Operator Training to meet the provisions of 40 CFR 60.5130(c)"

Signed Subpart MMMM SSI Operator Training and Qualification Document Certification Form

DEQ ACG-004 - Attachment 2

Subpart MMMM SSI Operator Training and Qualification
SSI Package Document Certification Form

*I certify, as a responsible official⁸ for _____,
that this document, the Subpart MMMM SSI Operator Training and Qualification Package, and all
related attachments were prepared under my direction or supervision in accordance with a
system designed to assure that qualified personnel properly gather and evaluate the information
submitted, and that the information submitted is, to the best of my knowledge and belief, true,
accurate, and complete.*

*I also certify the training course provided meets the requirements for initial operator training
and qualification pursuant to 40 CFR 60.5130 (c)(1)–(c)(3) at a minimum.*

*I also certify the training course provided meets the requirements for annual review/refresher
pursuant to 40 CFR 60.5145 (a)–(e) at minimum.*

SIGNATURE: _____ DATE: _____

NAME: _____

TITLE: _____

COMPANY: _____

PHONE: _____

E-MAIL: _____

ADDRESS: _____

⁸ <https://lis.virginia.gov/cgi-bin/leqp604.exe?000+reg+9VAC5-20-230>

DEQ ACG-004 - Attachment 3

Subpart MMMM SSI Operator Training and Qualification
Certificate

Certificates provided documenting training completion should include the following information:

**CERTIFICATE of
TRAINING and QUALIFICATION**

This document certifies

[OPERATOR NAME]

has completed the following:

Sewage Sludge Incinerator (SSI) Operator Training
to meet the provisions of 40 CFR 60.5130(c)

On MONTH DD, YYYY

DEQ ACG-004 - Attachment 4

Subpart MMMM SSI Operator Training and Qualification
Examination Cover Page

**SSI Operator Training Certification and Qualification
Examination**

This exam is administered upon completion of a Sewage Sludge Incinerator operator training course in accordance with Subpart MMMM of 40 CFR 60.5130(c)

Employee: _____ Date _____

Operator License ID No.: _____

Certification

This training is intended for Experienced SSI Operators and Supervisors with more than three years of experience directly overseeing experienced SSI Operators. Experienced SSI Operators have received in-house and on-the-job training and have demonstrated the following abilities for a minimum of one year:

- Operate the SSI in compliance with regulations and the facility's existing air permit
- Maintain the integrity of the process and its equipment
- Achieve the purpose of the SSI - pathogen destruction and solids reduction

Non-experienced SSI Operators may take this course for CEU credits, but will not be certified as a fully qualified SSI Operator until the minimum experience has been accomplished.

Certification as Experienced SSI Operator – Signature: _____

EXAM RESULTS:

NUMBER OF EXAM QUESTIONS: _____

NUMBER OF CORRECT ANSWERS: _____

SCORE (%): _____

(PASSING SCORE IS 70% OR GREATER)