



REGIONAL AIR POLLUTION CONTROL AGENCY

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February 27, 2009

Certified Mail

Mr. Richard Robertson
Department of Environmental Health & Safety
Wright State University
129 Allyn Hall
3640 Colonel Glenn Hwy
Dayton, OH 45435

RE: Ohio EPA Facility ID 0829060002
Compliance of air emissions unit N002 with OAC and GCBHAPCR Chapter 3745-105

WARNING LETTER

Dear Mr. Robertson:

On February 12 through 13, 2008, the Regional Air Pollution Control Agency (RAPCA) witnessed a performance test for particulate matter and carbon monoxide on air emissions unit (EU) N002 (pathological waste incinerator), located at the Wright State University (WSU) research laboratory, 3640 Colonel Glenn Highway in Fairborn, Ohio. This testing was conducted per Ohio Administrative Code (OAC) and Greene County Board of Health Air Pollution Control Regulations (GCBHAPCR) Chapter 3745-105, Pathological Waste Incinerators, which became effective on March 23, 2004. The performance testing conducted on February 12 through 13, 2008 on EU N002 did demonstrate compliance with the emissions limitations of OAC rule and GCBHAPCR section 3745-105-02, but WSU failed to show compliance with certain design parameters and operating restrictions provided in OAC rule and GCBHAPCR section 3745-105-03, as well as, monitoring requirements provided in OAC rule and GCBHAPCR section 3745-105-04.

Specifically, OAC rule and GCBHAPCR section 3745-105-03(D) states that the secondary combustion chamber of any pathological waste incinerator constructed on or before January 1, 1991 shall provide a minimum one-second retention time at one thousand six hundred (1600) degrees Fahrenheit. Retention time can be determined by dividing the volume (in ft³) of the secondary chamber by the actual volumetric flow rate emitted from the secondary chamber at maximum operating temperature and burning rate. Using this calculation, the retention time of the secondary chamber of EU N002 was determined to be 0.35 seconds. Failure to provide a one-second retention time in the secondary combustion chamber is a violation of OAC rule and GCBHAPCR section 3745-105-03(D) and Ohio Revised Code (ORC) 3704.05.

In addition, OAC rule and GCBHAPCR section 3745-105-04(C) states that all facilities that operate a pathological waste incinerator shall install, maintain and operate a radioactivity monitor and alarm. The radioactivity monitor shall be installed to monitor all pathological waste prior to combustion. During the February 12 through 13, 2008 performance testing of N002, RAPCA noted that WSU does not have a monitor and alarm in place, as required. Failure to install, maintain and operate a radioactivity monitor and alarm is a violation of OAC rule and GCBHAPCR section 3745-105-04(C) and ORC 3704.05.

In order to address the above mentioned violations, RAPCA is requiring that WSU submit a compliance plan and schedule, within thirty (30) days after receipt of this letter, including the corrective actions that WSU will pursue to correct the deficiencies and ensure that EU N002 maintains compliance with this regulation in the future.

If you have any questions regarding this matter, feel free to contact me at (937) 225-5923.

Sincerely,



Brandie K. Lehman

Air Pollution Control Specialist

Cc:	Jefferis Canan	RAPCA
	Lisa Holscher	U.S. EPA
	Tom Kalman	Ohio EPA

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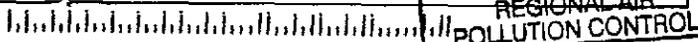


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