



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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September 3, 2010

Certified Mail

Mr. Rich Welker, Division Manager

Rumpke of Ohio Inc.

1300 E. Monument Street

Dayton, OH 45404

Dear Mr. Welker:

WARNING LETTER

On August 16, 2010, while conducting routine field surveillance, Christine Swetz and Maria Cruset from the Regional Air Pollution Control Agency (RAPCA) noted visible particulate emissions (VEs) from the metal stack located on the northeast side of the roof at Rumpke of Ohio Inc. (Rumpke) located at 1300 East Monument Street in Dayton, Ohio. This facility is identified by Ohio EPA facility ID 0857043073. The stack observed serves the rotary drum dryer, a component of emissions unit P901, a glass recycling plant at Rumpke. U.S. EPA Reference Method 9 (RM 9) readings were conducted on the dryer stack emissions by Christine Swetz for 18 minutes. A violation of Rumpke's Permit to Install (PTI) 08-04650, Permit to Operate (PTO) and Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) section 3745-17-07(A) was documented.

PTI 08-04650 was issued on January 18, 2005 for P901 and the PTO was issued on November 29, 2005. Per PTI 08-04650 and the PTO for P901, the rotary drum dryer is subject to OAC and MCCGHDAPCR section 3745-17-07(A), Visible particulate emission limitations for stack emissions. OAC rule and MCCGHDAPCR section 3745-17-07(A) states that visible particulate emissions from any stack may exceed 20% opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes, but shall not exceed 60 percent opacity, as a six-minute average, at any time. The RM 9 readings conducted by RAPCA on August 16, 2010 documented two non-overlapping six-minute exceedances of the 20% opacity limitation during the 18-minute observation period in violation of OAC rule and MCCGHDAPCR section 3745-17-07(A), PTI 08-04650, the PTO for P901 and Ohio Revised Code (ORC) 3704.05.

On August 18, 2010, Maria Cruset again observed VEs from the dryer stack at Rumpke and conducted RM 9 readings for 18 minutes. Two non-overlapping six-minute exceedances of the 20% opacity limitation were documented during the 18-minute observation period in violation of OAC rule and MCCGHDAPCR section 3745-17-07(A), PTI 08-04650, the PTO for P901 and Ohio Revised Code (ORC) 3704.05. Following her RM 9 readings, Ms. Cruset entered the

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facility and met with you to discuss the observations documented on both of the above occasions. At that time, a dryer baghouse pressure drop reading of 1.75" water column (WC) was recorded by RAPCA. You then instructed a plant employee to stop operations and investigate the situation. Later that day, you reported to RAPCA that three bags had fallen inside the baghouse. In a subsequent e-mail, dated August 24, 2010, Rumpke reported that the cause of the fallen bags appeared to be due to routine equipment vibrations and that all 49 bags had been replaced in the baghouse following the maintenance check on August 18, 2010. Rumpke also stated that the internal baghouse inspection frequency had recently been increased from weekly to daily.

The 1.75" WC pressure drop recorded by RAPCA on August 18, 2010, prior to the baghouse maintenance, was within the allowable limitation of one to four inches WC established in PTI 08-04650 and the PTO for the dryer baghouse. RAPCA understands from follow up correspondence with Rumpke that the dryer baghouse pressure drop monitor was working properly and had been calibrated in 2009. Due to the fact that VE violations were documented while pressure drop readings were within the allowable range, RAPCA is concerned that the baghouse pressure drop is not an accurate indicator of the emissions unit's compliance status. RAPCA is therefore requesting that Rumpke perform daily VE checks on the stacks serving P901 to assure ongoing compliance. Daily VE checks will be a requirement in the new Permit to Install and Operate (PTIO) for P901 which has been recently drafted and recommended to Ohio EPA for issuance.

On August 19, 2010, a RAPCA representative conducted follow up surveillance at the Rumpke facility and observed VEs from the dryer stack ranging between five to ten percent opacity which indicated that emissions from the dryer baghouse had returned to compliance. RAPCA appreciates Rumpke's cooperation and efforts to promptly address the dryer emissions and improve maintenance practices at the facility. If you have any questions regarding this matter, please contact me at (937) 496-7541.

Sincerely,



Christine A. Swetz
Air Pollution Control Specialist
Abatement Unit

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