



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

METROPOLITAN  
SEWER DISTRICT  
of greater  
CINCINNATI



21092  
Hamilton

June 11, 2013

Mr. David Brown  
Valicor Environmental Services, LLC  
11807 Reading Road  
Cincinnati, Ohio 45241

**RE: Valicor Environmental Services, LLC  
MSD of Greater Cincinnati  
Odor Complaints**

Dear Mr. Brown:

On May 15, 2013, Andrew Brougham, Greg Collins (both Metropolitan Sewer District of Greater Cincinnati, Division of Industrial Waste [MSD/DIW]), and Marianne Piekutowski (Ohio EPA) conducted an unannounced site visit at the Valicor Sharonville facility. David Weber, Gary Snow and Tom Hudson represented Valicor Environmental Services, LLC (Valicor). The purpose of the site visit was to follow-up on complaints forwarded from the Southwest Ohio Air Quality Agency (SWOQA).

From May 9 through 14, 2013, SWOQA had received complaints from Valicor's neighbors regarding odors from your facility, and on May 15, 2013, SWOQA forwarded these complaints to Ohio EPA for investigation. An unannounced site visit was conducted as part of this investigation. The site visit consisted of a walk-through inspection of the facility, and discussion of wastewaters treated and on-going steps to remedy the odor issues with facility representatives. At the time of the inspection, MSD/DIW was sampling the discharge from the facility as part of its normal sampling regime.

Valicor is regulated under Centralized Wastewater Treatment Standard - Oily and Organics Subpart, 40 CFR 437.46(e). Permits to install (PTIs) have been issued by Ohio EPA Division of Surface Water for wastewater pretreatment equipment. The facility discharges under an industrial user discharge permit issued by MSD. Valicor is not permitted to treat wastewaters associated with the metals subcategory. Valicor treats between 30 and 60 trucks a day of hazardous and non-hazardous wastewaters. In addition to permanent systems, there were ten frac tanks behind the facility. These tanks contained wastewaters that were to be bled into the treatment equipment over time. Valicor has two sets of two holding tanks; the trucks off-load incoming waste into the holding tanks, the wastewater is then tested, and the wastewaters are held until the

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results are received. One set of tanks is for the dedicated Valicor haulers, and the other set is for independent contractors. This process takes approximately twelve hours. When asked, Valicor noted nothing unusual, and there were a few independent contractors off-loading during the timeframe of the odor complaints.

On the day of the site visit, three distinct odors were noted within the perimeter of the facility. The first odor was a perfume/fabric softener smell. This odor was contained inside the facility. The second odor was a sulfur/oily smell. This odor was noted back by Tank 23 and a partially tarped roll-off box. The third odor was a sweet organic/leachate smell, which was related to the odor suppression system being tested for the facility.

Tank 23 contains solids that cannot be treated through the treatment systems and oily sludges from the treatment process. On the other side of the wall was a roll-off box with the tarp opened approximately half way. There were odors from this box noted outside of the facility, but the odor seemed to dissipate at the property line. This is the area believed to be responsible for the May 10, 2013 odors. On May 10, Rumpke was loading the solids from Tank 23 to be disposed of at the landfill. Due to the rain, the material was steaming when it was removed. This process is done six or seven times a week. The tarp was not closed on the roll-off box because of construction occurring at the facility. Once the construction is complete, the area will be enclosed, and a filter press will be located in this area. Valicor should consider keeping the roll-off box covered, and have a separate open dumpster for the construction work.

On the day of the inspection, Mr. Weber had been sampling the air around the odor suppression system. Mr. Weber stated there were no Lower Explosion Levels (LELs) out of range, no H<sub>2</sub>S odors, and no volatile organic compounds detected at that time.

In the past, Valicor has noted odors associated with leachate from Epperson Landfill from Kentucky and Bridgton Landfill in Missouri. To help with odors with the Epperson leachate, approximately six gallons of bleach is added when the tanker is off-loaded. The same type of process was discussed for the Bridgton leachate. Inspectors asked if the odors could be traced back to a particular source, and Mr. Weber indicated Valicor had just hired a consultant to look into which loads contained high levels of volatile organic compounds (VOCs) and other odor causing wastes. After the inspection, Mr. Brougham received a phone call from Mr. Weber stating they would no longer be accepting the Bridgton leachate. A copy of the incoming waste logs for May 9-14, 2013 was taken as part of the inspection.

When U.S. EPA developed the standard for regulating this type of industry, the issue of VOCs and volatilization was raised. In Federal Register/Vol.65, No. 247/Friday December 22, 2000/Rules and Regulations, pp. 81285-81286, the following is noted in the preamble to the promulgation of the final rule:

A. Air Pollution

CWT facilities generate wastewater that contain significant concentrations of organic compounds, some of which are also on the list of Hazardous Air Pollutants (HAPs) in title 3 of the Clean Air Act Amendments (CAAA) of 1990. These wastewaters often pass-through a series of collection and treatment units that are open to the atmosphere and allow wastewater containing organic compounds to contact ambient air. Atmospheric exposure of organic-containing wastewater may result in significant volatilization of both volatile organic compounds (VOC), which contribute to the formation of ambient ozone and HAP from the wastewater.

As discussed in the 1999 proposal, EPA considered including air stripping in the technology basis for today's limitation and standards, but rejected it because it would not have resulted in significantly different limitations. Because this rule would not allow any less stringent control of VOCs than is currently in place at most CWT facilities. EPA does not project any net increase in air emissions from volatilization of organic pollutants due today's final action. As such, no adverse air impacts are expected to occur as a result of today's regulations.

Although this rule does not require the use of air stripping with emissions control to control the emissions of volatile pollutants, EPA encourages all facilities that accept waste containing volatile pollutants to incorporate air stripping with overhead recovery or destruction into their wastewater treatment system. Additionally, EPA also notes that CWT sources of hazardous air pollutants are subject to maximum achievable control technology (MACT) as promulgated for off-site waste and recovery operations on July 1, 1996 (61 FR 34140) at 40 CFR Part 63.

The delineation of high VOCs and odor potential is needed to ensure proper treatment and the prevention of cross-media transfers. Presently, these compounds and any potential odors are concerns at this facility.

Items Requiring Additional Action by Valicor

- 1) Valicor must further investigate which sources of wastewater are associated with an increase in odor complaints. This should also be incorporated into the acceptance procedure for new wastestreams coming to the site for treatment. It should be noted, in the industrial user permit issued by MSD, there is language that requires characterization and documentation of every new wastewater wastestream, and reserves MSD's right to refuse the wastestream.
- 2) Valicor must provide the documentation for how incoming wastes are profiled, accepted and treated. This should include how the determination is done for classifying the wastewaters as oily, organic, or metals, and what would be done

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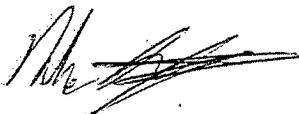
to prevent any metals subcategory wastewaters from being treated. It should also have the procedure for what is done if a wastewater is rejected.

- 3) Valicor must make arrangements for Ohio EPA staff to observe the unloading of Epperson leachate under adverse conditions.

Ohio EPA has been advised by SWOAQA, the city of Sharonville, and local private citizens that Valicor's operations at the Reading Road facility are a nuisance to the community, and that odors associated with the facility are excessive and chronic. While we have also been informed that Valicor has been taking measures to mitigate these problems, it is apparent that these efforts are inadequate. It is SWOAQA, MSD and Ohio EPA's expectation that Valicor work to minimize and eliminate the odors associated with its operations. As part of this effort, Ohio EPA requests a meeting with Valicor representatives, as well as representatives from SWOAQA, MSD, and the city of Sharonville to discuss the situation at the Reading Road facility, regulatory expectations, and Valicor's efforts to remedy these problems.

If you have any questions related to this report, please contact Andrew Brougham (MSD) at (513) 557-7012 or Marianne Piekutowski (Ohio EPA) at (937) 285-6108.

Sincerely,



Mike Proffitt  
Assistant District Chief  
Southwest District Office  
Ohio Environmental Protection Agency



Deborah H. Metz, Ph.D., M.B.A  
Superintendent  
Division of Industrial Waste  
Metropolitan Sewer District of Greater Cincinnati

cc: Brad Miller, SWOAQA  
Andy Brougham, MSD  
Jenny Richmond, MSD  
Mari Piekutowski, Ohio EPA/SWDO  
David Weber, Valicor Environmental Services, LLC