



REGIONAL AIR POLLUTION CONTROL AGENCY
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April 16, 2013

Certified Mail

Mr. Jim Bell, President
Veolia ES Technical Solutions, L.L.C.
720 Butterfield Rd.
Lombard, IL 60148

NOTICE OF VIOLATION (Non HPV)

Summary: The purpose of this Notice is to address numerous violations that have been identified with respect to federal and state testing, monitoring, recordkeeping and reporting requirements at Veolia ES Technical Solutions, L.L.C. (Veolia) located on 4301 Infirmiry Road in West Carrollton, Ohio. This facility is identified by Ohio EPA Facility ID 0857751346. Enforcement orders may be issued in the future to resolve these violations.

Dear Mr. Bell:

On November 8, 2012, representatives from the Regional Air Pollution Control Agency (RAPCA) performed an inspection at Veolia located on 4301 Infirmiry Road in West Carrollton, Montgomery County, Ohio. The purpose of RAPCA's inspection was to discuss and inspect plant operations and to review compliance with applicable air pollution control permit terms and conditions. Numerous monitoring, recordkeeping and reporting deficiencies were identified and discussed during RAPCA's visit and in the enclosed follow up e-mail sent to Veolia on November 30, 2012. To date, RAPCA has not received a response or the requested information from Veolia. The deficiencies are violations of Permit-to-Install and Operate (PTIO) P0106686, as well as New Source Performance Standards (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63 GGG, 40 CFR Part 61 Subpart V, 40 CFR Part 60 Subpart VVa, and 40 CFR Part 61 Subpart J.

PTIO P0106686 was issued and effective on September 12, 2011 for the following Ohio EPA emissions units (EUs) at Veolia's West Carrollton facility:

- B004: 12 MMBTU/hr Natural Gas Heater;
- P012: Unit 1 - Pot Still, Distillation Column, and Primary Condenser controlled by cryogenic solvent recovery system;

- P013: Unit 2 - Thin Film Evaporator, Fractionating Column, and Primary Condenser controlled by cryogenic solvent recovery system;
- P014: Unit 3 - Pot Still, Two Distillation Columns, and Primary Condenser controlled by cryogenic solvent recovery system;
- P015: Molecular Sieve controlled by vapor balance and cryogenic solvent recovery system;
- P016: Drum Dispersion Unit controlled by carbon canister adsorption system;
- P017: Drum Pumping Operation controlled by a vapor balance system and cryogenic solvent recovery system;
- P018: North and South Loading Racks controlled by vapor balance system and cryogenic solvent recovery system;
- P019: Tank Truck Cleaning controlled by vapor balance system and cryogenic solvent recovery system;
- T069-T107: 38 solvent tanks controlled by vapor balance system and cryogenic solvent recovery system.

PTIO P0106512 was issued and effective on July 19, 2010 for P001: Mobile Container Pumping Operation.

Permit to Install (PTI) P0105251 was issued and effective on August 20, 2009 for P011: Aerosol Can Processing Station.

During RAPCA's inspection on November 8, 2012, the following EUs contained in PTIO P0106686 were identified as having been installed and operating: P012, P013, P015, P017, P018, T069-T107. EUs P016 and P019 were partially installed but not fully operational. Ohio EPA's STARS2 database also indicates completion of installation for EU B004 but the operating status of the unit and many other EUs has not been updated. Veolia stated that EU P011 was not going to be installed.

Cryogenic Solvent Recovery System Design Evaluation Requirements:

As specified in PTIO P0106686, EUs P012, P013, P014, P015, P016, P017, P018, P019 and T069-T107 are subject to 40 CFR Part 63.1257(a)(1)(iii). Pursuant to PTIO P0106686 and 40 CFR Part 63.1257(a)(1)(iii), a design evaluation of the cryogenic solvent recovery system (CSRS) controlling EUs P012, P013, P014, P015, P017, P018, P019 and T069-T107 is required to measure and establish the maximum temperature(s) for the outlet gas stream at which the system can maintain a minimum overall control efficiency of 95%, or an outlet total organic compound (OC) concentration of less than 20 ppmv, whichever is less stringent. Completion of the design evaluation and submission of a comprehensive written report to RAPCA on the results of the testing was required prior to start up and operation of the EUs. This information was explained to Veolia during RAPCA's inspection. Veolia had not conducted the design evaluation as of the November 8, 2012 inspection. **To date, RAPCA has not received the results for the required design evaluation or any information to indicate that the evaluation has been completed. Failure to conduct the required design evaluation prior to EU start up and failure to submit a written report of the results is a violation of PTIO P0106686, 40 CFR Part 63.1257(a)(1)(iii) and ORC 3704.05.**

40 CFR Part 61 Subpart V, National Emission Standard for Equipment Leaks (Fugitive Emission Sources):

As specified in PTIO P0106686, EUs P012, P013, P014, P015, P016, P017, P018, P019 and T069-T107 are subject to 40 CFR Part 61 Subpart V. The regulation specifies requirements to prevent and minimize leaks as well as requirements for leak detection and repair (LDAR). Veolia is required to comply with the requirements of this subpart by implementation of a (LDAR) program which includes detailed monitoring, recordkeeping and reporting procedures to be implemented at the time of EU startup. **During RAPCA's inspection, it was noted that Veolia had not fully implemented a LDAR program, in violation of 40 CFR Part 61 Subpart V, PTIO P0106686 and ORC 3704.05.**

As specified in PTIO P0106686, EUs P012, P013, P014, P015, P016, P017, P018, P019 and T069-T107 are subject to 40 CFR Part 60 Subpart VVa, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, and 40 CFR Part 61 Subpart J, National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene. Pursuant to PTIO P0106686, sections 61.110(d) and 61.112(a) of Subpart J, and section 61.240(c) of Subpart V, compliance with 40 CFR Part 60 Subpart VVa and 40 CFR Part 61 Subpart J shall be achieved by complying with 40 CFR Part 61 Subpart V. **Therefore, failure to comply with 40 CFR Part 61 Subpart V also constitutes a violation of 40 CFR Part 60 Subpart VVa, and 40 CFR Part 61 Subpart J.**

EU P016, Drum Dispersion Unit:

At the time of RAPCA's inspection on November 8, 2012, EU P016 was not fully operational. Veolia explained that the unit was not operating at anticipated levels due to programming issues and the most suitable type of control system for EU P016 was still under consideration. Pursuant to PTIO P0106686 and 40 CFR Part 63 Subpart GGG, Veolia is required to vent emissions from EU P016 to a carbon canister adsorption system which can maintain a minimum overall control efficiency of 95%, or an outlet total OC concentration of less than 20 ppmv, whichever is less stringent.

Compliance with the control efficiency/OC concentration limitations must be demonstrated by testing (option 1) within 60 days of max production, but no later than 180 days after initial EU startup or by a design evaluation of the carbon canister adsorption system (option 2), which must be completed prior to startup of EU P016. Daily monitoring and recordkeeping is required as detailed in PTIO P0106686. RAPCA's November 30, 2012 e-mail requested that Veolia provide the chosen method of compliance demonstration, but no response has been received by RAPCA to date.

In order to determine the compliance status of EU P016, RAPCA requires that, within 45 calendar days of receipt of this letter, Veolia provide RAPCA with the operating status of EU P016, the date the unit became, or is anticipated to become, fully operational, the chosen method of control and compliance demonstration, results of testing or design evaluation if conducted, daily monitoring and recordkeeping parameters which are currently being recorded, or will be recorded, and any changes that were made to the EU

or its associated controls which deviate from the information submitted in the PTIO application for EU P016. RAPCA reminds Veolia that quarterly and semi-annual reports are required per PTIO P0106686 and 40 CFR Part 61 Subpart V following startup and operation of EU P016.

As stated in RAPCA's November 30, 2012 email, should Veolia elect to make physical changes to EU P016 or the associated controls, modifications to the PTIO may be necessary. Veolia shall submit a PTIO application to reflect any such changes.

PTIO Monitoring and Recordkeeping Requirements:

PTIO P0106686 Term and Condition B.18 requires Veolia to calculate and maintain monthly records of the facility-wide OC emissions, including monthly and rolling, 12-month summations of the monthly emissions. RAPCA's inspection identified Veolia's failure to calculate this information. RAPCA's November 30, 2012 e-mail provided Veolia with information for determining the monthly OC emissions. **Failure to calculate and maintain records for the above facility-wide OC emissions is a violation of PTIO P0106686 and ORC 3704.05.**

PTIO P0106686 requires Veolia to determine all 3-hour blocks of time when the average temperature(s) of the exhaust gases from the CSRS was/were more than the average temperature measured during the most recent design evaluation that demonstrated compliance with the required control efficiency or outlet total OC concentration. Detailed recordkeeping and corrective actions are required when deviations from the established CSRS exhaust gas temperature are recorded.

While RAPCA's inspection documented that Veolia was continuously monitoring the outlet temperature from the CSRS, it was noted that Veolia was not reducing the data any further (i.e. to 3-hour or daily averages). **Due to Veolia's failure to complete the CSRS design evaluation, a maximum temperature for the outlet gas stream at which the system can maintain compliance with the required control efficiency or outlet total OC concentration cannot be established and the required monitoring, recordkeeping and corrective actions in response to deviations cannot be fulfilled in violation of PTIO P0106686 and ORC 3704.05.**

At the time of RAPCA's inspection, Veolia had not completed the development of a LDAR program. It was explained that the facility was still in the process of tagging all valves, pumps, compressors and other equipment subject to the LDAR requirements. **Required monitoring and recordkeeping associated with the LDAR program have therefore not been fulfilled in violation of 40 CFR Part 61 Subpart V, 40 CFR Part 61 Subpart J, 40 CFR Part 60 Subpart VvA, PTIO P0106686 and ORC 3704.05.**

Reporting Violations:

Veolia has failed to submit the following reports:

- Quarterly reports associated with deviations of the established CSRS exhaust gas temperature and corrective actions, venting of process emissions and records

- maintenance, required pursuant to section 63.1260 of Subpart GGG and PTIO P0106686;
- If P016 is fully operational, quarterly reports associated with deviations of the carbon canister adsorption system removal efficiency or carbon canister replacement intervals, venting of process emissions and records maintenance required by PTIO P0106686;
 - Semiannual reports associated with the LDAR program, required by section 61.247 of Subpart V;
 - Quarterly reports identifying exceedances of the rolling, 12-month emission limitation for facility-wide OC, required by PTIO P0106686;
 - Annual Permit Evaluation Report (PER) required by PTIOs P0106686 and P0106512 for EUs B004, P001, P012, P013, P014, P015, P016, P017, P018, P019 and T069-T107. This reporting requirement was discussed in RAPCA's November 30, 2012 follow up e-mail to Veolia and in the enclosed reminder letter to Veolia from Ohio EPA, dated January 4, 2013.

During RAPCA's November 8, 2012 inspection, Veolia was advised of the quarterly reporting requirements which were not being met. RAPCA provided Veolia with additional information pertaining to the applicable reporting requirements, including the annual PER, in its follow up e-mail sent on November 30, 2012. None of the required reports have been received to date.

Failure to submit the aforementioned annual, semiannual and quarterly reports are violations of PTIO P0106686, 40 CFR Part 61 Subpart V, 40 CFR Part 60 Subpart VVa, 40 CFR Part 61 Subpart J and ORC 3704.05.

Summary:

Due to the numerous testing, monitoring, recordkeeping and reporting violations identified above, it is imperative that Veolia take immediate action to correct the deficiencies and demonstrate compliance with PTIO P0106686 and all applicable NSPS and NESHAP standards and requirements.

The attached table summarizes the applicable NSPS and NESHAP subparts as well as testing, monitoring, recordkeeping and reporting required by the applicable subparts and PTIO P0106686. The status of each emissions unit is designated as noncompliant or unknown for each applicable regulation or requirement. It is unclear if Veolia is performing all of the applicable notification, testing, monitoring and recordkeeping required by 40 CFR Part 60 Subparts A and VVa, 40 CFR Part 61 Subparts A, J, V and FF, and 40 CFR Part 63 Subparts A, GGG, FFFF and VVVVVV.

Within 45 calendar days of receipt of this letter, RAPCA requires Veolia to submit the following:

- 1) RAPCA requires that Veolia submit documentation to verify their compliance status with all PTIO, NSPS and NESHAP requirements for each emissions unit. For each applicable testing, monitoring, recordkeeping and reporting requirement contained in PTIO P0106686 and each of the applicable NSPS and NESHAP subparts, Veolia shall specify

the applicable section [e.g. *PTIO T&C C.3.d(2)a.*, *NESHAP 63.1257(a)(1)(iii)*], the corresponding requirement(s), the action the facility has implemented to comply, and the date(s) on which compliance was achieved. This shall include submittal of any required notifications, design evaluations, testing, reports and a description of the monitoring procedures being performed. If the facility has not completed implementation of any of the applicable requirements, they shall identify each specific deficiency, including the applicable section and corresponding requirement(s) and provide a timeline for completion of each such requirement.

- 2) P016: The operating status of EU P016, the date the unit became, or is anticipated to become, fully operational, the chosen method of control and compliance demonstration, results of testing or design evaluation if conducted, date of anticipated testing or design evaluation completion if not yet conducted, daily monitoring and recordkeeping parameters which are currently being recorded, or will be recorded, and any changes that were made to the EU or its associated controls which deviate from the information submitted in the PTIO application for EU P016.
- 3) A single report shall be submitted which identifies the failure to properly monitor, record and report for all past due quarterly and semiannual reports identified above.
- 4) Annual PER (2012) – to include completion of initial installation dates and commencement of operation dates as well as identification of the aforementioned monitoring, recordkeeping and reporting failures for EUs B004, P001, P012, P013, P014, P015, P016, P017, P018, P019 and T069-T107.
- 5) Annual calendar year Fee Emission Report (FER) due April 15, 2013. For more information on the FER, refer to the enclosed reminder letter to Veolia from Ohio EPA, dated January 18, 2013.
- 6) Veolia's facility profile information and individual EU operating status in Ohio EPA's STARS2 database is not current. RAPCA requests that Veolia update this information electronically, via Ohio EPA's eBusiness Center: Air Services. This information should clarify the status of EUs P011 and P014 as well as the installation and operating status of all EUs at the facility and any other profile changes or updates.
- 7) Manufacturer data regarding the thermocouple used to measure the CSRS exhaust gas temperature, as requested in RAPCA's November 30, 2012 e-mail.
- 8) If applicable, a PTIO application for any physical changes made to, or planned for, EU P016.

Acceptance of the above information by RAPCA does not constitute a waiver of the Ohio EPA's and RAPCA's authority to seek civil penalties as provided in section 3704.06 and 3707.49 of the Ohio Revised Code. The determination whether to pursue such penalties will be made by the Ohio EPA and RAPCA at a later date.

Mr. Jim Bell
Veolia ES Technical Solutions, L.L.C
April 16, 2013
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RAPCA appreciates your prompt attention to this matter. If you have any questions, you may contact Christine Swetz at (937) 496-7541, or me at (937) 496-7540.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer S. Marsee".

Jennifer S. Marsee
Abatement Unit Supervisor

Enclosures

cc: Darek Teeters, Veolia-Ohio Valley Branch General Manager
John Hannah, Veolia-West Carrollton
Brian Dickens, U.S. EPA (via e-mail)
Bruce Weinberg, Ohio EPA (via e-mail)

Compliance summary for PTIO P0106686

	= noncompliance
	= compliance status unknown

X = Applicable

	CSRS control	Vapor balance control	CCAS control	40 CFR Part 60 Subpart A	40 CFR Part 60 Subpart VVx	40 CFR Part 61 Subpart A	40 CFR Part 61 Subpart J	40 CFR Part 61 Subpart V	40 CFR Part 61 Subpart FF	40 CFR Part 63 Subpart A	40 CFR Part 63 Subpart GGG	40 CFR Part 63 Subpart FFFF	Monitoring, Recordkeeping	Testing	Reporting, Notification, PER	*USEPA enforced 40 CFR Part 63 Subpart VVVVVV*
B004													Fuel other than natural gas		Deviation with 30 days; NR, PER	
P012	X			X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	X
P013	X			X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	X
P014 (installation not complete)	X			X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	X
P015	X	X		X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	X
P016 (installation not complete)			X	X	X	X	X	X	X	X	X	X	Daily - Option 1 or 2	Opt 1: 95% control eff./outlet OC conc. OR- Opt 2: CCAS design eval.	Qtrly (Opt 1 or 2), Notif., PER, semi-annual	X
P017	X	X		X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	X
P018	X	X		X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	
P019 (installation not complete)	X	X		X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	X
T069-T107	X	X		X	X	X	X	X	X	X	X	X	CSRS Exhaust gas temp.	Design evaluation of the CSRS	Qtrly, Notif., PER, semi-annual	X

Continuous temp monitor req'd for CSRS exhaust gas temp; compliance based on avg. over any 3-hr block of time

P016: Opt 1 testing req'd with 90 days of max. prod. But no later than 180 days after initial EU startup; Opt 2 design eval w/ report req'd prior to EU startup. No reports submitted for req'd testing (Opt. 1 or 2); Opt. 1 report due with 30 days of test - (210 days of startup)

Qtrly Facility-Wide (ov. reporting also req'd for rolling 12-month OC conc. per Sec. 6 Facility-Wide Te&C)

EUs controlled by CSRS. Design evaluation req'd prior to EU startup & operation; No design eval. req'd to date

Swetz, Christine

From: Riley, Jennifer
Sent: Friday, November 30, 2012 12:13 PM
To: john.hannah@veoliaes.com
Subject: Inspection Follow up
Attachments: design eval criteria per GGG.docx; temperature monitoring reqs.docx; reporting reqs.docx

Hello John-

As follow up to my site visit on 11/9 and our conversation on 11/27, here is a list of items that we discussed:

1. **Design Evaluation for the cryogenic system:** The permit references 40 CFR Part 63 Subpart GGG, Section 63.1257(a)(1)(iii). See the attached document titled 'design eval criteria per GGG' for the specific requirements. This report was due to be submitted PRIOR to **startup** of the unit. Please review the requirements and submit a comprehensive written report for the results of the testing as soon as possible. If you haven't completed the testing, please schedule to do so as soon as possible and communicate your schedule for completing the test with me.
2. **Leak Detection and Repair (LDAR):** The permit cites 40 CFR Part 61 Subpart V, NESHAP for Equipment Leaks, as the over-arching requirements for LDAR. There are many requirements in the rule for tagging subject equipment, performing regular visual and/or RM 21 leak inspections for specific equipment, correcting leaks, keeping records, and submitting reports. To date, RAPCA is not aware that you are meeting any of these requirements fully.
3. **Monthly Records of Organic Compound (OC) Emissions:** Requirements for emission calculations are specified in PTI under Section B. Facility-Wide Terms and Conditions 17. There are not specifics for calculating emissions in this section. Section C. Emission Unit Terms and Conditions for each emission unit/group of emissions unit under f) better explains how to determine emissions. Also, the PTI application includes information on how emission rates were determined. If you need copies of any of these documents, please let me know.
4. **3-hr Temperature Limit on the cryogenic system exhaust gases:** A temperature limit can not be set for the unit the design evaluation is completed.
5. **Temperature Logging Requirements:** See attached document titled 'temperature monitoring reqs' for some information I pulled from your permit and Subpart GGG. Essentially, I believe if you monitor and record temperatures at least every 15-minutes and then average these 15-min temperatures for each 3-hr block of time and record the average you will fulfill the monitoring and record keeping requirements.
6. **Thermocouple Certification:** Please provide some manufacturer's data regarding the thermocouple used to measure the exhaust temperature from the cryogenic unit.
7. **Record Keeping for Emissions Units vented to the Cryogenic Unit:** Requirements for records related to the cryogenic unit are specified in the PTI under Section C. Emission Unit Terms and Conditions for each emission unit/group of emissions units under d). Specifically: 1. Daily records of any 3-hr blocks of time when the cryogenic unit's exhaust temperature was NOT in compliance; 2. Log or records of operating time for the capture collection system, cryogenic system, monitoring equipment, and associated emissions units; 3. Temperature Deviations- misc. records required per d)(3) in the PTI Section C.
8. **DDU (P016):** As we discussed, this unit is not quite operating at normal/anticipated levels due to programming issues. I also realize that Veolia is evaluating the appropriateness of the control system. The carbon system outlet was either to be tested daily to determine the efficiency of the system OR a design evaluation performed. Are either of these options being used for compliance purposes? As Veolia makes decisions for the future of this air emissions unit and they include changes, the PTI may need to be modified. Please communicate changes to RAPCA as they are decided upon.

9. **Reports:** PTI PO106686 requires various reports. See attached list titled 'reporting reqs' for specifics. Currently, due to lack of records and the fact that Veolia has not determined a temperature limit for the cryogenic unit, quarterly deviation reports are not very simple to submit. As an alternative to submitting deviation reports, the annual PER due in February will need to include ALL issues of noncompliance including the failure to submit reports.
10. **Misc. Requirements:** With the applicability of many federal rules- NSPS, NESHAP, and MACT, there are other notification, monitoring, record keeping, and reporting requirements. I will not spell each of those out for you in this e-mail, but will address these requirements at a later time. I just wanted to mention that they do exist.

I appreciate your attention to the above items. To formalize the issues noted above, RAPCA will be sending you a letter in the near future.

Feel free to give me a call if you have any questions.

Thanks!

Jennifer M. Riley
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40 CFR Part 63 Subpart GGG (Pharmaceutical MACT), Section 63.1257(a)(1)(iii)

(a) *General.* Except as specified in paragraph (a)(5) of this section, the procedures specified in paragraphs (c), (d), (e), and (f) of this section are required to demonstrate initial compliance with §§ 63.1253, 63.1254, 63.1256, and 63.1252(e), respectively. The provisions in paragraphs (a)(2) and (3) apply to performance tests that are specified in paragraphs (c), (d), and (e) of this section. The provisions in paragraph (a)(5) of this section are used to demonstrate initial compliance with the alternative standards specified in §§ 63.1253(d) and 63.1254(c). The provisions in paragraph (a)(6) of this section are used to comply with the outlet concentration requirements specified in §§ 63.1253(c), 63.1254(a)(2)(i), and (a)(3)(ii)(B), 63.1254(b)(i), and 63.1256(h)(2). Performance tests shall be conducted under such conditions representative of performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

(1) *Design evaluation.* To demonstrate that a control device meets the required control efficiency, a design evaluation must address the composition and organic HAP concentration of the vent stream entering the control device. A design evaluation also must address other vent stream characteristics and control device operating parameters as specified in any one of paragraphs (a)(1) (i) through (vi) of this section, depending on the type of control device that is used. If the vent stream is not the only inlet to the control device, the efficiency demonstration also must consider all other vapors, gases, and liquids, other than fuels, received by the control device.

(iii) For a condenser, the design evaluation shall consider the vent stream flow rate, relative humidity, and temperature and shall establish the design outlet organic HAP compound concentration level, design average temperature of the condenser exhaust vent stream, and the design average temperatures of the coolant fluid at the condenser inlet and outlet. The temperature of the gas stream exiting the condenser must be measured and used to establish the outlet organic HAP concentration.

PTI P0106686 Section C. Emission Unit Terms and Conditions, d)Monitoring and Record Keeping Requirements (various emission units, all those vented to the cryogenic system)

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature(s) of the exhaust gases from the cryogenic solvent recovery system, for any 3-hour block of time, shall not be more than the average temperature measured during the most recent design evaluation conducted in accordance with 40 CFR 63.1257(a)(1)(iii) that demonstrates the cryogenic solvent recovery system has a minimum overall control efficiency of 95%, on a total weight-basis, or an outlet total OC concentration of less than 20 ppmv, whichever is less stringent. Until testing has been conducted, the cryogenic solvent recovery system shall be operated and maintained in accordance with the manufacturer's recommendations.
- (2) The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature(s) of the exhaust gases from the cryogenic solvent recovery system when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee.

*NOTE by JMR: There are no specific requirements as far as the number of temperatures that must be recorded in a 3-hr period per the PTI.

40 CFR Part 63 Subpart GGG, Pharmaceutical MACT, Section 63.1258(b)(iii)

(iii) *Condensers* . For each condenser, the owner or operator shall establish the maximum condenser outlet gas temperature or product side temperature as a site specific operating parameter which must be measured and recorded at least every 15 minutes during the period in which the condenser is functioning in achieving the HAP removal required by this subpart.

(A) The temperature monitoring device must be accurate to within ± 2 percent of the temperature measured in degrees Celsius or ± 2.5 °C, whichever is greater.

(B) The temperature monitoring device must be calibrated annually.

Quarterly Reports

Due Jan 31, April 30, July 31, and Oct 31 each year

- Facility-Wide Emission Limit Deviations
- Emissions Units vented to the Cryogenic System
 - each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases from the cryogenic solvent recovery system was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
 - any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the cryogenic solvent recovery system;
 - each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases from the cryogenic solvent recovery system into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

- P016

If the permittee chooses “Option 1” in f)(2):

- an identification of all time periods during which the carbon canister adsorption canister operated at a removal efficiency of less than 95%, and the carbon canister was not changed immediately;
- any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to either the cryogenic solvent recovery system or the carbon canister adsorption system; and
- each incident of deviation described in “a” or “b” where proper records were not maintained as identified in the monitoring and record keeping requirements of this permit.

If the permittee chooses “Option 2” in f)(2):

- an identification of all instances the time interval between canister replacement exceeded the maximum time interval determined during the most recent design evaluation conducted in accordance with 40 CFR 63.1257(a)(1)(v) that demonstrates the carbon canister adsorption system has a minimum overall control efficiency of 95%, on a total

weight-basis, or an outlet total OC concentration of less than 20 ppmv, whichever is less stringent;

- any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to either the cryogenic solvent recovery system or the carbon canister adsorption system; and
- each incident of deviation described in "a" or "b" where proper records were not maintained as identified in the monitoring and record keeping requirements of this permit.

Note by JMR: The quarterly deviation reports can be in whatever format you choose but should include reference to the Permit and Emissions Units (state 'all emissions units under this permit' or identify each), identify each reporting requirement as stated above and list any deviations OR state that 'there have been no deviations except' and list the deviations.

Permit Evaluation Report (PER)

Due February 15 each year. OEPA should send a reminder via regular mail and/or Air Services. Report should be completed in Air Services for ALL emissions units.

Report must include any deviations from emission limits, operational restrictions, monitoring, record keeping and/or reporting requirements.

Example 1: Late or no reports submitted in 2012. The PER for 2012 would indicate reports were submitted late or not at all for each air emissions unit that submitted late reports.

Example 2: Deviations from an operation limit occurred through the year and WERE reported in quarterly deviation reports. The PER may reference the reports that included those deviations so that you do not have to restate them.

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

1/4/2013

John Hannah
Veolia ES Technical Solutions, L.L.C.
4301 Infirmiry Road
P.O. Box 453
West Carrollton, OH 45449-0453

RE: ANNUAL PERMIT EVALUATION REPORT
Due Date: Feb 15, 2013
Reporting Period: 01/01/2012 - 12/31/2012
Facility ID: 0857751346
Current Facility Location: 4301 Infirmiry Road
Miamisburg, OH 45342-1278

Dear Permit Holder:

Under your Permit-to-Install and Operate (PTIO) you must submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER summarizes the activity over a 12-month period for each emissions unit (EU) that has been issued a PTIO, including deviations and exceedances.

The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date indicated above. The report must include each EU listed in Table I to satisfy PER reporting obligations. In addition to the PER, please remember that your PTIOs may specify other state or federal reporting requirements.

Table I: Emissions Units with Issued PTIOs

<i>EU ID</i>	<i>EU Description</i>	<i>Company Equipment ID</i>	<i>Permit Number</i>	<i>PTIO Effective Date</i>
B004	12 MMBTU/hr Heater	Heater 1	P0106686	9/12/2011
P001	Mobile Container Pumping Operation	Mobile Container Pumping Operation	P0106512	7/19/2010
P012	Unit 1 - Distillation Column	Unit 1	P0106686	9/12/2011
P013	Thin Film Evaporator and Fractionating Column	Unit 2	P0106686	9/12/2011
P014	Two Distillation Columns	Unit 3	P0106686	9/12/2011
P015	Molecular Sieve	Molecular Sieve	P0106686	9/12/2011
P016	Drum Dispersion Unit	Drum Dispersion Unit	P0106686	9/12/2011
P017	Drum Pumping Operation	Drum Pumping Operation	P0106686	9/12/2011
P018	North and South Loading Racks	Loading Racks	P0106686	9/12/2011
P019	Tank Truck Cleaning	Tank Truck Cleaning	P0106686	9/12/2011
T069	8,000 gallon clean solvent tank	TK-2001	P0106686	9/12/2011
T070	8,000 gallon clean solvent tank	TK-2002	P0106686	9/12/2011
T071	8,000 gallon clean solvent tank	Tank TK-2003	P0106686	9/12/2011

T072	8,000 gallon clean solvent tank	TK-2004	P0106686	9/12/2011
T073	8,000 gallon dirty solvent tank	TK-1001	P0106686	9/12/2011
T074	8,000 gallon dirty solvent tank	TK-1002	P0106686	9/12/2011
T075	7,500 gallon clean solvent tank	TK-2012	P0106686	9/12/2011
T076	7,500 gallon clean solvent tank	TK-2013	P0106686	9/12/2011
T077	7,500 gallon clean solvent tank	TK-2014	P0106686	9/12/2011
T078	7,500 gallon clean solvent tank	TK-2015	P0106686	9/12/2011
T079	7,500 gallon clean solvent tank	TK-2016	P0106686	9/12/2011
T080	19,750 gallon clean solvent tank	TK-2009	P0106686	9/12/2011
T081	19,750 gallon clean solvent tank	TK-2010	P0106686	9/12/2011
T082	14,000 gallon clean solvent tank	TK-2011	P0106686	9/12/2011
T083	13,000 gallon clean solvent tank	TK-2005	P0106686	9/12/2011
T084	13,000 gallon clean solvent tank	TK-2006	P0106686	9/12/2011
T085	13,000 gallon clean solvent tank	TK-2007	P0106686	9/12/2011
T086	13,000 gallon clean solvent tank	TK-2008	P0106686	9/12/2011
T087	19,750 gallon dirty solvent tank	TK-1020	P0106686	9/12/2011
T088	19,750 gallon dirty solvent tank	TK-1021	P0106686	9/12/2011
T089	19,750 gallon dirty solvent tank	TK-1022	P0106686	9/12/2011
T090	19,750 gallon dirty solvent tank	TK-1023	P0106686	9/12/2011
T091	12,000 gallon dirty solvent tank	TK-1017	P0106686	9/12/2011
T092	12,000 gallon dirty solvent tank	TK-1004	P0106686	9/12/2011
T093	12,000 gallon dirty solvent tank	TK-1005	P0106686	9/12/2011
T094	12,000 gallon dirty solvent tank	TK-1006	P0106686	9/12/2011
T095	12,000 gallon dirty solvent tank	TK-1007	P0106686	9/12/2011
T096	12,000 gallon dirty solvent tank	TK-1008	P0106686	9/12/2011
T097	12,000 gallon dirty solvent tank	TK-1009	P0106686	9/12/2011
T098	12,000 gallon dirty solvent tank	TK-1010	P0106686	9/12/2011
T099	12,000 gallon dirty solvent tank	TK-1011	P0106686	9/12/2011
T100	12,000 gallon dirty solvent tank	TK-1012	P0106686	9/12/2011
T101	12,000 gallon dirty solvent tank	TK-1013	P0106686	9/12/2011
T102	12,000 gallon dirty solvent tank	TK-1014	P0106686	9/12/2011
T103	12,000 gallon dirty solvent tank	Tank D-5	P0106686	9/12/2011
T104	12,000 gallon dirty solvent tank	TK-1016	P0106686	9/12/2011
T105	12,000 gallon dirty solvent tank	TK-1003	P0106686	9/12/2011
T106	12,000 gallon dirty solvent tank	TK-1018	P0106686	9/12/2011
T107	12,000 gallon dirty solvent tank	TK-1019	P0106686	9/12/2011

Note: If your PTIO is a federally enforceable PTIO (FEPTIO) you are also required to submit quarterly reports, consistent with the terms and conditions of your FEPTIO, for ONLY those terms and conditions associated with your federally enforceable limitation(s). Depending on the due date of your annual PER, one of your required quarterly reports will be due approximately two weeks earlier than the PER report. For example, if the annual PER due date is May 15th, there will always be a quarterly report due on April 30th. Because the annual PER report will cover very similar information as the quarterly reporting requirement, you may submit the annual PER by the quarterly report due date (two weeks earlier) to cover both reporting requirements.

For more information on the eBusiness Center or Air Services, go to the Ohio EPA Web page (epa.ohio.gov) and click on "Do Business" from the top banner then select "Answer Place" from the list of Online Services. Search on "Air Services" or "eBusiness Center". You may also contact Elisa Thomas at (614) 644-3621 for assistance. In the Answer Place you can also search on "PTIO" to find information regarding this report. If additional assistance is needed in completing the PER, you may contact the Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (800) 329-7518.

Sincerely,

A handwritten signature in black ink, appearing to read "Erica R. Engel-Ishida". The signature is fluid and cursive, with a long horizontal stroke at the end.

Erica R. Engel-Ishida
DAPC Supervisor, Permit Issuance and Emissions Reporting Unit

Cc: RAPCA

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

1/18/2013

John Hannah
Veolia ES Technical Solutions, L.L.C.
4301 Infirmery Road
P.O. Box 453
West Carrollton, OH 45449-0453

**Re: Requirement to Submit Emissions Reports for 2012
by April 15, 2013 for:**

0857751346
Veolia ES Technical Solutions, L.L.C.
4301 Infirmery Road
Miamisburg, OH 45342-1278
Montgomery County

Helpful Links

eBusiness Center

<https://ebiz.epa.ohio.gov>

Ohio EPA Answer Place

<http://ohioepa.custhelp.com>

Search keywords to find answers and tutorials on emissions reporting and Air Services!

Air Services Web Page

epa.ohio.gov/dapc/airservices.aspx

Engineering Guide #71

epa.ohio.gov/dapc/engineer/eguides.aspx

Dear John Hannah:

April 15, 2013, is the deadline for all owners/operators of Synthetic Minor Title V facilities to submit their calendar year 2012 Fee Emissions Report (FER) and Emissions Inventory Summary (EIS). The FER and EIS must be submitted via the eBusiness Center: Air Services. The information in this letter is designed to help you:

- **Know the regulatory justification for emissions reporting requirements.**
- **Submit reports successfully by the Authorized Representative.**

Know the regulatory basis for the emissions reporting requirements

Failure to submit these emissions reports by the April 15, 2013, deadline is considered a violation of Ohio EPA rules and may result in enforcement action being taken against the facility.

Fee Emissions Report - Your company has been identified as owning or operating a facility subject to the Synthetic Minor Title V emissions reporting requirements of Ohio Administrative Code (OAC) 3745-78-02(F) for calendar year 2012. "Synthetic Minor Title V" (SMTV) facility means a facility for which one or more permits have been issued for the air contaminant sources at the facility that include terms and conditions that lower the facility's potential to emit air contaminants below the major source thresholds established in rules adopted under Section 3704.036 of the Ohio Revised Code. It is a requirement of your permits and Ohio law to submit these reports annually. Once filed, the reports undergo review by the appropriate District Office or Local Air Agency. Data from these reports is used to assess a fee on the actual amount of emissions of particulate matter, sulfur dioxide, nitrogen oxides, organic compounds and lead. The fee schedule for reporting year 2012 is available on the Air Pollution Control Web page <http://www.epa.ohio.gov/dapc> by selecting the topic "Synthetic Minor Fees".

Emissions Inventory Summary - Ohio EPA has the authority to under OAC rule 3745-15-03 to request and receive the information from regulated entities. Emissions information is provided to U.S. EPA to develop an annual criteria and toxic pollutant inventory. Beginning with 2009 all SMTV facilities have been required to file a complete EIS annually.

Submit reports successfully by the Authorized Representative

The Authorized Representative, (see Ohio Revised Code 3745.11.1,) must sign off on the submission of the FER/EIS. Signature can be accomplished by actually entering his/her PIN during the submit process or by signing an attestation form that is uploaded during the submit process. If the latter option is chosen, the person performing the submit process and entering his/her PIN must be an employee of the company; consultants should not submit.

You can get assistance with Air Services from the following sources:

- **Help within Air Services** - click the word "Help" in the top right corner of any Air Services screen to get context specific information.
- **Searchable topics and fast responses to new questions** - DAPC heavily relies on the Agency "Answer Place" to post topics, videos, training information, and links to guidance on all information related to Air Services. If you can't find an answer, simply ask a new question and get a response within 1 business day!
- **Training Videos** - We have posted video training sessions on the Answer Place. We currently have videos posted on topics from getting an account, to developing your facility profile, emissions reporting, compliance reporting, and more.
- **Phone assistance** - DAPC Central Office staff along with your District Office or local air agency contacts are ready and waiting to assist you.

<u>Topic:</u>	<u>Contact:</u>
Synthetic Minor applicability	Regional Air Pollution Control Agency (937)225-4435
eBusiness Center account or PIN	eBusiness Center Helpdesk, 1-877-EPA-BIZZ
Air Services Access	Linda Lazich, (614) 644-3626 or linda.lazich@epa.state.oh.us
Emissions Reporting	Elisa Thomas (614) 644-3621 or elisa.thomas@epa.state.oh.us Safaa El Oraby (614) 644-3571 or safaa.eloraby@epa.state.oh.us

Please contact us with any questions you may have.

Sincerely,



Erica R. Engel-Ishida
DAPC Supervisor, Permit Issuance and Emissions Reporting Unit