



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 17, 2007

RE: NOTICE OF VIOLATION
FOR VIOLATION OF TERMS AND
CONDITIONS
IN PERMITS-TO-INSTALL (#02-18743 &
02-20067) AND TITLE V PERMIT
0215020233
CERTIFIED MAIL

Mr. John Peterka
Von Roll America, Inc./ WTI
1250 St. George Street
East Liverpool, OH 43920

Dear Mr. Peterka:

Ohio EPA, Division of Air Pollution Control, finds that Von Roll America/WTI violated, on June 19, 2007, the terms and conditions in its Permits-to-Install (#02-20067 issued on 9/26/06 and #02-18743 issued on 12/9/07) and Title V permit (issued on February 18, 2004) when uncontrolled emissions were vented to the atmosphere for 7 ½ hours.

On June 19, 2007, a tanker containing ethylene diamine (EDA)/methanol was being unloaded into tank T-10 within the organic tank farm. T-10 already contained two other waste streams. Upon loading, there was a rapid pressure and temperature increase in T-10, causing the rupture disk of the tank to blow. The vapors from T-10 were then vented into the vapor recovery header. At this point, the emergency bypass system within the vapor recovery system activated to redirect vapors away from the incinerator to the carbon boxes. However, excessive pressure in the vapor recovery system forced vapors through a closed damper and into the Primary Air Duct where they were ignited by the kiln, causing a rapid pressure release through the Primary Air Fan and the carbon adsorption system. A fire occurred at the mixing box of the vapor recovery system. Damage to the Primary Air Fan led to a quick back draft within the carbon adsorption ductwork and caused vapors to again ignite leading to a second and third pressure release. These releases caused damage to the carbon adsorption system and also extinguished any remaining fire in the carbon adsorption/Primary Air Fan area.

It is reported that the reaction within T-10 affected approximately 21,000 lbs of material. Some of the vapors were directed to the kiln while remaining vapors were vented to atmosphere. Additionally, the vapor recovery system was rendered inoperable for approximately 7 ½ hours until repairs could be made.

MR. JOHN PETERKA
DECEMBER 17, 2007
PAGE 2

The vapor recovery system collects vapors from the three tanker transfer stations (P003, P004 and P005), loose solid waste pits (F002), container processing (P001), and the several insignificant emissions units (tanks) in the organic tank farm, which includes T-10.

Section III.A.1.2 (Additional Terms and Conditions) for emissions units P003, P004 and P005 in PTI #02-20067 and emissions units P001 and F002 in PTI #02-18743 provides requirements for the vapor recovery system, and how emissions generated at each emissions unit are to be transferred by the vapor recovery system to the incinerator and/or the carbon adsorption system. These requirements are based on the requirements of 40 CFR 61, Subpart FF (National Emission Standards for Benzene Waste Operation) and 40 CFR 63, Subpart DD (National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations). 40 CFR 61, Subpart FF and 40 CFR 63, Subpart DD are also cited in the Title V Permit as applicable for the entire facility, which includes the insignificant emissions units (tanks) in the organic tank farm, where T-10 is located.

Term III.A.1.2.k.iii for F002 and Term III.A.2.m.iii for P001 in PTI #02-18743 and Term III.A.1.2.h.iii for P003, P004 and P005 in PTI #02-20067 states the following: "One or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials."

Two rupture disks within the vapor recovery system are reported to have blown vapors into the atmosphere. However, Von Roll/WTI failed to prevent physical damage to the system, in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials. Additionally, because of the failure to prevent physical damage to the system, Von Roll failed to transfer vapors from F002, P001 and the tanks to the incinerator and/or carbon adsorption system for 7 ½ hours until repairs were made.

In your final report dated October 30, 2007, you list three corrective and preventative actions that are already completed. They are as follows: 1) WTI modified the facility maintenance procedure to minimize air introduction into the tank farm following tank maintenance. 2) WTI no longer places siloxane-type material from the specific generator into the tank farm. These waste streams are now processed as direct-to-killn. 3) Tank temperatures will not be allowed to exceed 120 degrees Fahrenheit while still operating under the current vapor recovery set up. Ohio EPA, DAPC, accepts these completed, corrective and preventative actions.

MR. JOHN PETERKA
DECEMBER 17, 2007
PAGE 3

You also proposed the following corrective and preventative actions: 1) Screening methods, other than the standard bench tests, will be researched and developed, if applicable, to provide WTI a better tool for guaranteeing waste mix compatibility. 2) Isolate the vapor recovery in the tank farm from routing vapors to the kiln.

You report the second corrective and preventative action is currently utilized in the pump out tank farm system. Please provide this office, Division of Air Pollution Control, additional information on the vapor recovery system on the pump out tank farm area, and the proposed change to the vapor recovery system for the organic tank farm. In your report, please provide us with an updated diagram on your vapor recovery system, showing each pick up point, headers, blowers, rupture valves, mixing box, damper, etc. Please submit this report within two weeks of receipt of this letter.

The submission of the requested information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

Failure to respond to this notice in the time frame specified will result in further enforcement action up to and including a referral to the Central Office of Ohio EPA for appropriate action. Also note that this Notice of Violation in no way waives the right of the Ohio EPA or USEPA to pursue additional enforcement action regarding the violations discussed in this notice, and/or any additional violations that may be found.

If you have any questions, please contact me at (330) 963-1237.

Sincerely,



Pamela L. Korenewych
Environmental Specialist
Division of Air Pollution Control

PLK:bo

cc: Dennis Bush, Ohio EPA, NEDO, DAPC
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