

EASIIR INS3 Report for Stericycle 0950169 4/22-23/14

Stericycle completed the initial performance test of the modified HMIWI pollution control system required by permit 0950169-008-AC. Compliance with the amended emission standards of 40 CFR 60 Subpart Ce is required by June 1, 2014 (See permit 0950169-007-AV condition B.1). The testing was audited by EPD inspectors John Kasper, Assefa Hailemariam and Omar Horta. Facility contacts were Dale Silva, Kelly Roberts, Jim Gaspar, Jean Paradis and Al Burson. The testing crew, led by Derek Brewster, was from TRC Environmental Corporation in Raleigh, NC.

Testing for VE, PM, metals and dioxin/furan was done on 4/22/14 am and pm and 4/23/14 am. Testing for VE, SO₂, NO_x, CO and HCl was done on 4/23/14 pm. Test runs for dioxin/furan lasted 4 hours each. Test runs for metals were 2 hours each. Test runs for the others were 1 hour each. There were 3 runs for all tests except for HCl, for which there were 4 runs. The testing crew received audit samples for HCl and metals. The testing followed the protocol from TRC dated April 2014.

Permit 0950169-007-AV condition 31 required monitoring of operating parameters for the HMIWI and pollution control system. The parameter values determined during the compliance testing are to be used as permit limits during normal operation. The facility planned to monitor all of these parameters on the Data Acquisition System (DAS). Just before the second run on 4/23/14 pm, JMK noticed that one of the parameters (scrubber pressure drop) was not being monitored as required. JMK suggested they install a gage to measure the pressure drop and manually record data every minute as required by the permit. The scrubber is designed to remove HCl from the exhaust gases, and the other pollutants are not significantly affected. So, the scrubber pressure drop data is required during three HCl test runs. Since one HCl test run had been completed without the pressure drop data, the facility decided to do a fourth HCl test run to have three test runs with pressure drop data. The permit calls for parameter data for 3-hour rolling totals, so the facility was instructed to manually collect pressure drop data every minute for five consecutive hours, so they would have data for 3-hour rolling totals for each HCl run. JMK reviewed the initial pressure drop data and observed that the pressure drop was low and varied from 1.5 to 3 inwc with no apparent trend. JMK accepted this approach as providing adequate data for the scrubber pressure drop. The facility said they planned to install a pressure transducer and modify the DAS to show scrubber pressure drop as soon as possible, within several days.

An apparent cause for the confusion about the scrubber pressure drop is the note in condition 31 regarding this measurement. It states that “¹This parameter shall be monitored unless US EPA approves the alternative monitoring procedure to be requested by the permittee.” The note was added to the permit because Stericycle or their permitting consultant objected to this measurement in the draft permit. However, no one followed up on this with EPA because neither EPD nor Stericycle had any record of EPA approving an alternate sampling procedure. Measuring the scrubber pressure drop is required by 40 CFR 60 Subpart Ec.

JMK also noted that the facility did not use ammonia as the SNCR reagent, as stated on the DAS. They used a commercially available urea solution (Diesel Emission Fluid) because they said it avoided operational problems they had with ammonia.

JMK reminded the facility that the test report was due by 5/16/14 to allow EPD time to review the report by the 6/1/14 compliance date.

The facility (Roberts) asked about test frequency and timing of annual tests. Specifically, can they change the annual testing time to April from July, and do they have to do the full performance test (with dioxin/furan and all the others) to renew the permit in 2017 or can they retest in 2019? First, testing in April is OK because that is now their frequency base date. JMK referred the other question to FDEP

Tallahassee. Tally responded that Rule 62-297.310 has 10 scenarios where testing would not be required, and if they don't fit into one of those they have to test. Rule 62-297.310(7)(a) has 10 sub-paragraphs. The only one that may fit here is 3, which says that units that are required to do annual tests may submit the latest annual test results. But here, that does not do them much good. The permit requires VE, PM, metals, dioxin/furan, SO₂, NO_x, CO and HCl every 5 years. It requires annual tests for VE, PM, metals and HCl, annual testing for CO for 3 consecutive years. The permit expires in 2017, so they would have to do testing for VE, PM, metals, HCL, CO annually until then. They would have to test for dioxin/furan, SO₂, NO_x, in addition to the others, for the permit renewal. JMK thinks they should get back on the same sequence they had before, where they do the test for everything just prior to permit renewal. Then there is no question they comply with 62-297.310(7)(a)1 that requires them to "...conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining an operation permit...".