



Florida Department of Environmental Protection

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Tallahassee Branch Office
630-3 Capital Circle Northeast
Tallahassee, Florida 32301

May 12, 2009

SENT VIA EMAIL

Linda.dunwoody@veoliaes.com

Randy.william@veoliaes.com

Linda Dunwoody
Operations Manager
Veolia ES Technical Solutions, L.L.C.
342 Marpan Lane
Tallahassee, Florida 32305

Dear Ms. Dunwoody:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The permit **expires May 19, 2012**. The program identification number for this facility is 0730094. This letter applies only to activities covered by the Air Resource Management Program.

Based on the inspection results, the Tallahassee Branch Office reported a status of **In-Compliance** for your facility. Note that your compliance status may be subject to further review by the District Program Office.

The inspection checklist and its comments section are enclosed. The assistance you provided is appreciated. If you have any questions, your local contact is Tracy White at (850) 488-3704 or tracy.a.white@dep.state.fl.us.

Sincerely,

Marlane Castellanos
Branch Manager

MC/tw
Enclosures

cc: Rick Bradburn, FDEP, Pensacola
Mary Beth Curle, FDEP
Erica Mitchell, FDEP



**VOLUME REDUCTION, MERCURY RECOVERY,
MERCURY RECLAMATION PROCESSES**



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO: _____

AIRS ID#: 0730094 **DATE:** 4/21/2009 **ARRIVE:** _____ **DEPART:** _____
FACILITY NAME: VEOLIA ES TECHNICAL-TALLAHASSEE
FACILITY LOCATION: 342 Marpan Lane
 TALLAHASSEE 32305
OWNER/AUTHORIZED REPRESENTATIVE: GREG NEWTON **PHONE:** (850)877-8299
CONTACT NAME: _____ **PHONE:** _____
ENTITLEMENT PERIOD: 5/19/2007 / 5/19/2012
(effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: CONTROL TECHNOLOGY– Rule 62-210.300, F.A.C.

(check appropriate box(es))

1. Does the facility operate any emissions units other than the volume reduction, mercury recovery, and mercury reclamation processes and emissions units which are exempt from permitting pursuant to the criteria of paragraph 62-210.300(3)(a), or (b), F.A.C., or have been exempted from permitting under Rule 62-4.040, F.A.C.? (Rule 62-210.300(4)(c), F.A.C.)----- Yes No
2. Does this facility emit or have the potential to emit 10 tons per year or more of mercury? (Rule 62-210.300(4)(c)1., F.A.C.)----- Yes No
3. Was the highest reported exposure limit observed equal to or less than the United States Occupational Safety and Health Administration's (OSHA) permissible exposure limit (PEL) of 1mg/10m³ for mercury vapor as set forth in 29 CFR 1910.1000, Table Z-2? (Rule 62-296.417(1)(a), F.A.C.)----- Yes No
4. Is the area in which the processing equipment (as defined in Rule 62-737.200, F.A.C.) is located, fully enclosed and kept under negative pressure while processing mercury containing lamps or devices? (Rule 62-296.417(1)(b))----- Yes No
5. Does this facility control mercury emissions through the use of: (check either a) or b) whichever is applicable)
 - a) dual air handling systems?
 - b) a single air handling system with redundant mercury controls?

NOTE: **If you have checked 5.a) above, then proceed on to Page 2 and questions 6 through 12 which cover Dual Air Handling Systems.*

***If you have checked 5.b) above, then skip questions 6 through 12 and proceed on to questions 13 through 16 which cover Single Air Handling Systems with Redundant Mercury Controls.*

PART II: CONTROL TECHNOLOGY— Rule 62-210.300, F.A.C. (continued)

(check appropriate box(es))

***Dual Air Handling Systems**

6. Has the owner or operator installed a primary air handling system with air pollution control equipment in order to reduce the mercury content of the air collected during the volume reduction and mercury recovery and reclamation processes? (Rule 62-296.417(1)(c)1., F.A.C.)----- Yes No
7. Is the air collected by the primary system, vented within a fully enclosed area of the facility after the air is filtered through the air pollution control equipment? (Rule 62-296.417(1)(c)2., F.A.C.)----- Yes No
8. Once each day, while mercury-containing lamps or devices are being processed, is a sample of air collected from within the fully enclosed area of the facility in which the air collected by the primary air handling system is vented? (Rule 62-696.417(1)(c)3., F.A.C.)----- Yes No
- a) Is the mercury content of the sample determined and compared with the OSHA PEL?----- Yes No
9. Does the owner or operator operate, monitor, and maintain the primary system air pollution control equipment in such a manner as not to exceed the OSHA PEL for mercury vapor within the fully enclosed area of the facility in which the air collected by the primary air handling system is vented? (Rule 62-296.417(1)(c)4., F.A.C.)----- Yes No
10. Has the owner or operator installed a secondary air handling system in order to maintain negative pressure in the fully enclosed area of the facility in which the air collected by the primary system is vented? (Rule 62-696.417(1)(c)5., F.A.C.)----- Yes No
11. Has the owner or operator installed, and do they operate, monitor and maintain air pollution control equipment to reduce the mercury content of the air collected by the secondary air handling system? (Rule 62-696.417(1)(c)6., F.A.C.)----- Yes No
12. Is the primary air handling system with air pollution controls independent and separate from the secondary air handling system with air pollution controls? (Rule 62-696.417(1)(c)7., F.A.C.)----- Yes No
- a) Do the primary and secondary air handling systems air pollution controls incorporate carbon filters or equivalent technology?----- Yes No

****Single Air Handling Systems with Redundant Mercury Controls**

13. Does the owner or operator operate, monitor, and maintain an air handling system with redundant air pollution control equipment in order to reduce the mercury content of the air collected during the volume reduction, and mercury recovery and reclamation processes? (Rule 62-296.417(1)(d)1., F.A.C.)----- Yes No
14. Does the redundant air pollution control equipment incorporate at least two (2) carbon filters or equivalent technology arranged in series so that the air passes through both filters before being released? (Rule 62-296.417(1)(d)2., F.A.C.)----- Yes No
- a) Is each filter designed to ensure compliance with the OSHA PEL for mercury vapor at the emission point in the event of a single filter failure?----- Yes No
- b) Was the highest reported exposure limit observed equal to or less than the OSHA PEL of 1 mg/10m³ for mercury vapor?----- Yes No
15. As the facility processes any mercury-containing lamps or devices once each day, and while mercury-containing lamps or devices are being processed, is a sample of air collected downstream of the first carbon filter (or equivalent technology) and upstream of the second? (Rule 62-296.417(1)(d)3., F.A.C.)----- Yes No
- a) Is the mercury content of the sample determined and compared with the OSHA PEL?----- Yes No
16. Does the owner or operator, operate, monitor and maintain the air pollution control equipment in such a manner as not to exceed the OSHA PEL for mercury vapor downstream of the first carbon filter (or equivalent technology) and upstream of the second? (Rule 62-296.417(1)(d)4., F.A.C.)----- Yes No

PART III: RECORDKEEPING REQUIREMENTS—Rule 62-210.300(3)(a)27. & 28., F.A.C. & 62-210.300(4)(c)1., F.A.C.

(check appropriate box(es))

1. Does the owner or operator of this facility which is subject to this rule maintain records of monitoring information that specifies and includes: (Rule 62-296.417(2), F.A.C.)
 - a) the date, place and time of measurement?----- Yes No
 - b) the methodology used?----- Yes No
 - c) the analytical results?----- Yes No
 - d) calibration and maintenance records of monitoring equipment?----- Yes No
2. Does the owner/operator retain records of all monitoring data and supporting information, and make available for Department inspection, these records for a period of at least five years from the date of collection? (Rule 62-296.417(2), F.A.C.)----- Yes No

PART IV: GENERAL CONDITIONS/MAINTENANCE REQUIREMENTS – Rule 62-210.300(4)(e)6., 8., & 12., F.A.C.

(check appropriate box(es))

1. Does the owner or operator make every reasonable effort to conduct the specific activity authorized by the general permit in a manner that minimizes adverse effects on adjacent property or on public use of the adjacent property, where applicable, and on the environment, including fish, wildlife, natural resources, water quality, or air quality?----- Yes No
2. Does the owner or operator maintain the permitted facility, emission unit, or activity in good condition? Yes No
3. Has the owner or operator allowed the circumvention of any applicable air pollution control devices?--- Yes No
4. Has the owner or operator allowed the emission of air pollutants as the result of the malfunction of, or inoperable condition of applicable air pollution control devices?----- Yes No

PART V: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300(4)(d)4., F.A.C.

(check appropriate box(es))

A. New or Modified Process Equipment

1. Since the last inspection has there been
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- Yes No
 - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, F.A.C.) to the appropriate DEP or local program office?----- Yes No

Tracy White

4/21/2009

Inspector's Name (Please Print)

Date of Inspection


Inspector's Signature

6-12 months

Approximate Date of Next Inspection

COMMENTS:

I met with Randy Williams. Records were available and maintained (once/day).

Recordkeeping items that were reviewed were as follows: Retort Air room, item #16; Retort processing, item #14; Fluorescent Lamp processing, item #12; HID processing, item #18 .

The latest Jerome analyzer calibration sheets were observed and copies requested and received. Apparently they are re-calibrated once/year. The analyzers were physically present at the site.

I viewed the four major equipment areas (as listed above for recordkeeping). I recommended to Mr. Williams that all unnecessary openings in enclosed containment area walls (Fluorescent Lamp processing) be sealed, especially if the opening(s) lessen the formation of a negative environment in the room.

I recommended, since the two sets of staged filters appear to be in parallel, that the HID processing sampling port have both carbon filter outlets with separate test ports instead of one port connected to both final carbon filter inlets.

All applicable equipment appeared to have sampling ports.

Recommendations:

No additional recommendations.