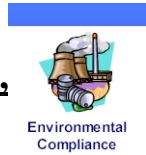




# VOLUME REDUCTION, MERCURY RECOVERY, MERCURY RECLAMATION PROCESSES



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0730094 **DATE:** 8/10/2011 **ARRIVE:** 11:00 **DEPART:** \_\_\_\_\_

**FACILITY NAME:** VEOLIA ES TECHNICAL-TALLAHASSEE

**FACILITY LOCATION:** 342 Marpan Lane  
TALLAHASSEE 32305

**OWNER/AUTHORIZED REPRESENTATIVE:** GEORGE MARTIN **PHONE:**  
**Email:** **Mobile:**  
**CONTACT NAME:** GREG NEWTON **PHONE:** (602)233-2955  
**Email:** greg.newton@veoliaes.com **Mobile:**  
**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))

- 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
- 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
- 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/10m<sup>3</sup> 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
- 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
- Does this facility control mercury emissions through the use of: (check  either a) or b) whichever is applicable)
  - dual air handling systems?
  - 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/10m<sup>3</sup> 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

8/10/2011

Inspector's Name (Please Print)

Date of Inspection

*Tracy White*

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** I met with Linda Dunwoody and Randy Williams. I requested the recordkeeping documentation that is required by rule. Ms. Dunwoody provided the annual calibration records for the mercury analyzers. She also provided the monitoring log for carbon filter mercury concentration levels. I compared the readings against the OSHA PEL standard of 0.1 mg/m3.

We determined that log sheet item #14, "Distiller Between 1st and 2nd Carbon Unit," had exceeded the OSHA PEL during the time period of November 2010 to August 5, 2011.

Ms. Dunwoody mentioned that monitoring may have occurred during a different shift after the November 2010 time period. I requested that she could provide the Department with a letter of explanation for what may have caused the elevated readings for the Distiller unit, item #14.

I observed the facility. The negative pressure containment area that had been added to the HID machine for processing of CFBs (see last inspection report for more details) had been removed. Ms. Dunwoody indicated that the facility no longer processes CFBs.

I requested that Mr. Williams use one of the analyzers to test carbon canisters ports belonging only to the external equipment (i.e. not enclosed in a processing room). The readings appeared to be compliant.

At the request of Carol Melton, this checklist will be initially forwarded to the NW District Air program office for review and determination of compliance status.

The facility appears to be in violation for the following issue:

Log sheet item #14, "Distiller Between 1st and 2nd Carbon Unit," appeared to have exceeded the OSHA PEL during the time period of November 2010 to August 5, 2011.

General Permit Rule 62-296.417(1)(d)4.

4. The owner or operator shall operate, monitor and maintain the air pollution control equipment in such a manner as not to exceed the OSHA permissible exposure limit for mercury vapor downstream of the first carbon filter (or equivalent technology) and upstream of the second.