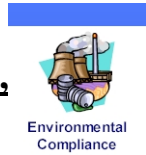




VOLUME REDUCTION, MERCURY RECOVERY, MERCURY RECLAMATION PROCESSES



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730094 **DATE:** 6/28/2012 **ARRIVE:** 10:45 **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 **Facility may be operating without Entitlement!**
 (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/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
- 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/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

6/28/2012

Inspector's Name (Please Print)

Date of Inspection

Tracy White

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

I met with Randy Williams. Mr. Williams provided monitoring records and monitoring equipment calibration records. No issues were noted. Daily sample point data (since the last inspection) appeared to be under the OSHA PEL threshold limit.

Afterwards we observed the facility equipment. No equipment changes were noted, with the exception that the facility was now attempting to reinstate a compact fluorescent light bulb processing area.

For this new process area, a processing station consisting of a steel rectangular box was present. The box is a partial enclosure where the glass portion of the bulb would be separated from the base (screw) portion. An open area on top of the box provided employee access. The box was connected to a duct pipe that leads to a filter, then two carbon canisters connected in series, along with an induced draft fan. The fan provided a localized negative pressure work area inside the box.

After filtration, the exhaust was vented through a stack pipe to the inside of the building. In addition, a pull-over curtain was installed between the processing equipment area and the remaining interior of the building. Due to large gaps at the head and base, the curtain did not appear to fully provide a negative pressure enclosed room area.

The carbon filters did not yet have a sampling port installed. Mr. Williams indicated that the new area was experimental and that initial processing had "started this week." The new processing line was not in operation during the inspection.

I recommended that the area be fully enclosed for negative containment and a sampling port be installed between the filters.

Recommendations:

Ms. Dunwoody was contacted by phone on 7/20/2012 for the expired permit. She indicated she would look into the issue.

A new processing line for compact fluorescent light bulbs appeared to be installed and is under consideration at the facility. Please submit the appropriate revised Permit application information for the additional unit (new equipment installation).

Monitoring records should be established and maintained for the new compact bulb processing line. A carbon canister monitoring port should be properly installed for the new control equipment.

Possible violations or issues:

The permit entitlement has expired.

The facility should submit permit modification information for the new CF bulb processing line.