



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

CARR BUILDING, SUITE 115
3800 COMMONWEALTH BLVD
TALLAHASSEE, FLORIDA 32399

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

January 10, 2013

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

Email: linda.dunwoody@veoliaes.com

Re: Veolia Mercury Reclamation Facility
Facility Air ID 0730094
Leon County

Dear Ms. Dunwoody:

Department personnel conducted a compliance inspection of the above-referenced facility on December 11, 2013. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Tracy White at (850) 245-2960 or by via e-mail tracy.a.white@dep.state.fl.us .

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Mathews". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Mathews
Environmental Manager

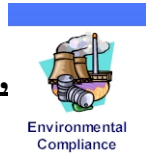
MM/tw

Enclosures: Inspection report

c: Mary Beth Curle, Carol Melton (FDEP, Pensacola)



VOLUME REDUCTION, MERCURY RECOVERY,
MERCURY RECLAMATION PROCESSES



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0730094 DATE: 12/11/2013 ARRIVE: 9:45 A.M DEPART: 10:45 A.M.
FACILITY NAME: VEOLIA ES TECHNICAL SOLUTION-TALLAHASSEE
FACILITY LOCATION: 342 MARPAN LN
TALLAHASSEE 32305-0904
OWNER/AUTHORIZED REPRESENTATIVE: LINDA DUNWOODY* PHONE: (850)877-8299
Email: linda.dunwoody@veoliaes.com Mobile: (850)251-4924
CONTACT NAME: LINDA DUNWOODY* PHONE: (850)877-8299
Email: linda.dunwoody@veoliaes.com Mobile: (850)251-4924
ENTITLEMENT PERIOD: 9/2/2012 / 9/2/2017
(effective date) (end date)

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

[X] IN COMPLIANCE [] MINOR Non-COMPLIANCE [] SIGNIFICANT Non-COMPLIANCE

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

(check [X] appropriate box(es))

- 1. Does the facility operate any emissions units other than the volume reduction, mercury recovery, and mercury reclamation processes... [] Yes [X] No
2. Does this facility emit or have the potential to emit 10 tons per year or more of mercury? [] Yes [X] 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... [X] 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? [X] Yes [] No
5. Does this facility control mercury emissions through the use of: (check [X] either a) or b) whichever is applicable)
a) dual air handling systems? []
b) a single air handling system with redundant mercury controls? [X]

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

12/11/2013

 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. Ms. Dunwoody and I discussed the CFL's processing line. She indicated that the facility no longer processes CFLs. The bulbs are accumulated, packaged and shipped out to another processing facility.

I reviewed the records pertaining to monitoring and monitoring equipment-calibration. Records were maintained and available for inspection. Afterwards I observed the facility.

No changes to equipment were noted. Carbon canisters and monitoring ports were in-place for each set of equipment. The equipment was in operation.

Outside of the Fluorescent Lamp Processing equipment room, a worker in PPE was emptying a red drum, that contained broken glass material, onto the outside conveyor-belt feed. The outside belt normally fed unprocessed material to the crusher/tumbler processing equipment which was located inside the negative containment room. I observed a small particulate emission from the material as it was unloaded onto the outside conveyor belt.

From further discussion, Ms. Dunwoody indicated that the material was "overflow or spillover" of lamps that occurred inside the containment area. When the processing room is routinely cleaned (i.e. material is removed from the floor, etc.), the accumulated material is stored in red drums until it can be re-introduced into the processing equipment (from the outside conveyor belt).

We discussed alternative solutions for keeping the overflow material from potentially contaminating the area outside negative containment, including additional "best management practices" and/or engineered solutions. The staff explained they would work on possible solutions to the issue.

Recommendations:

Please contact this office (Tracy White, 850-245-2960 or e-mail) when a solution has been implemented for the spillover material issue, preferably within 60 days from the date of this inspection.