Ogulei, David

From: Kathy Strubberg [kathys@syaeng.com]
Sent: Thursday, April 03, 2014 9:28 AM
To: Ogulei, David
Cc: 'Paddock, Nancy'; 'Dennis Warchol'
Subject: Veolia Response

Importance: High

David,

I apologize for not getting this to you sooner. There was a mixup as I thought Veolia was sending this response directly to you and they thought I was sending it. Anyway, here is Veolia's response to your question.

As we discussed in our phone conversation, Veolia requests the ability to change the methodology used to calculate volatile emissions from the following emission units:

Emission Unit	Description
MP-1	Material Processing Area
MP-2	Material Processing Area
Lab Pack Repack	Batch Material Processing Area
Bulk Feed Building	Bulk Solid Waste Storage

The current Part 71 permit requires the use of the most recent version of the TANKS program to calculate VOM/HAP emissions from the MP-1, MP-2 and Lab Pack Repack emission units [Permit Condition 2.2(E)(3). Although the permit doesn't contain a similar condition for the Bulk Feed Building, the proposed new methodology differs from that used in the permit application.

Veolia believes that a more appropriate calculation methodology is the Surface Evaporation Model as found in the EPA's EIIP Volume II: Chapter 8 Section 4.1.4, "Preferred and Alternative Methods of Estimating Air Emissions from Paint and Ink Manufacturing Facilities", February 2005. This model calculation is more appropriate than the TANKS model for the following reasons.

1. MP-1, MP-2 and the Lab Pack Repack units are waste storage and processing buildings utilized for containers. Containers are received into the buildings and held there prior to processing either within the building or directly to the incinerator feeds. The stored containers are closed with a lid or cover which allows no volatiles to escape the container during storage. Containers are only opened to sample and process the contents. The processing consists of placing the waste from a container either into open troughs through which the waste moves through sizing activities and is repacked into feed containers; or directly into feed containers. The waste in the trough is open to the atmosphere of the building. As such constituents in the waste volatilize into the building atmosphere and are emitted through the building exhaust.

2. The surface evaporation model estimates the amount of constituents volatized based on the volatility of the different waste constituents and the air flow across the exposed surface of the waste. It is a conservative estimate as the calculations assumes that the air flow will be saturated with organic compounds where in reality, this is not the case.

This summarizes the reasons why the Surface Evaporation Model produces more representative emission estimations than the TANKS program for the MP-1, MP-2, Lab Pack Repack and Bulk Feed Building emission units at the plant.

Please call me if you need anything further regarding this matter.

Regards,
Kathy

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