

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

DATE: JUN 21 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Ross Incineration Services, Inc., Grafton, Ohio

FROM: Charles Hall, Environmental Engineer *C Hall*
AECAB (MN/OH)

THRU: Dakota Prentice, Acting Section Chief
AECAB (MN/OH)

TO: File, Ross Incineration Services, Inc., Grafton, Ohio

BASIC INFORMATION

Facility Name: Ross Incineration Services, Inc.

Facility Location: 36790 Giles Road, Grafton, Ohio

Date of Inspection: 07 May 2019

EPA Inspector(s):

1. Charles Hall, Environmental Engineer
2. Kosta Loukeris, Environmental Engineer

Other Attendees:

1. Debbie Bishop, Compliance Supervisor
2. Steve Goldman, Vice President of Technology
3. Zac Johnson, Environmental Technician II
4. Susan Kaiser, Director of Corporate Environmental, Health, & Safety (closing conference only)
5. Pat Lawson, Vice President, Corporate Compliance and Risk Management (closing conference only)

Contact Email Address: sgoldman@rossenvironmental.com

Purpose of Inspection: tanks inspection

Facility Type: Off-site waste and recovery operations and hazardous waste incinerator

Regulations Central to Inspection: National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, 40 C.F.R. Part 63, Subpart DD (OSWRO), National Emission Standard for Benzene Waste Operations (BWON), at 40 C.F.R. Part 61, Subpart FF

Arrival Time: 10:35 a.m. EDT

Departure Time: 4:35 p.m. EDT

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Bishop, Goldman, Johnson, Kaiser, or Lawson unless otherwise noted.

Process Description:

Ross Incineration Services (Ross) receives solid and liquid hazardous and non-hazardous wastes. Ross either stores bulk liquids in a 10,000-gallon storage tank before incineration or feeds the liquid waste directly from a tank trailer into the incinerator. Wastes that Ross feeds directly from a tank trailer include reactive wastes, alcohols, and ketones. Each tank in Tank Farms 1, 2, and 3 is connected to a header vent which exhausts to a carbon bed system. Tanks 73 and 74, which are located at the process dock, are not connected to a carbon bed system. All hazardous waste tanks are subject to the Level 2 controls per the OSWRO standard. Ross introduces nitrogen into the header to maintain a blanket across all the hazardous and non-hazardous waste tanks.

TOUR INFORMATION

EPA toured the facility: Yes

Photos and/or Videos were taken during this inspection.

Field Measurements were taken during this inspection.

The inspectors used a forward-looking infrared camera to identify potentially leaking components on hazardous waste storage tanks and a total hydrocarbon analyzer, Toxic Vapor Analyzer 2020, to measure the hazardous air pollutant emission concentration in parts per million by volume (ppmV) from equipment components. The following tables summarize the calibration of the analyzer and concentrations detected from each component monitored.

Calibration of EPA Toxic Vapor Analyzer (Cleveland Office)

Calibration Gas Standard	Confirmation Reading -11:46 am
500 ppm	501 ppm
10,000 ppm	9,951 ppm

Tank Number	Location	Highest Measurement, ppmV
37	agitator	1,287
37	tank cover	< 3
38	tank cover	< 3
39	tank cover	< 5
40	tank cover	98
41	tank cover	< 10
42	not in service	not in service
43	tank cover	< 3
44	tank cover	30
45	tank cover	47
46	tank cover	< 5
47	tank cover	140
48	tank cover	142
49	tank cover	< 5
50	tank cover	< 3
51	agitator	6,300
51	tank cover	25
52	tank cover	4,700
53	tank cover	44
54	tank cover	24
55	tank cover	390
59	tank cover	< 5
60	not in service	not in service
61	tank cover	388
62	tank cover	4,500
63	tank cover	< 5
64	tank cover	< 5
73	agitator	< 10
73	lower cover seal	7,800 (visible leak also)
73	tank cover	< 3
73	upper rupture disk	15,000
74	agitator	< 5
74	lower rupture disk	1,303

Tank Number	Location	Highest Measurement, ppmV
74	tank cover	< 5

RECORDS REVIEW

EPA reviewed the weekly visual inspection records Ross maintains for pumps and agitators. The records observed do not include the identification of each pump and agitator that needs to be monitored weekly. In addition, the observation of the agitators does not specify that the individual performing the visual observation needs to look at the agitator seal for a visible liquid leak.

CLOSING CONFERENCE

Requested Documents:

- Benzene TAB Report for 2017 and 2018; and
- Semiannual Title V OSWRO Reports for 2017 and 2018 with the Benzene Monitoring Logs.

Concerns: Hall and Loukeris reviewed their measurements greater than 5 ppmV for each component listed in the table above.

SIGNATURES

Lead Inspector:



Date:

08 July 2019

Section Chief:



Date:

7/8/19

APPENDICES AND ATTACHMENTS

1. Digital image/video log
2. Digital images and videos on CD

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Constantinos Loukeris	2. Date(s) of Inspection: May 7, 2019
3. Company/Facility Name: Ross Incineration	4. Street Address, City, State: 36790 Giles Road, Grafton, Ohio
5. Number of Images: 7	6. Archival Record Location: CD-R labeled "Ross Incineration, Grafton, OH, Inspection videos 5/7/2019"

Image Number	File Name	Date	Description of Image
1	MOV_0047.mp4	5/7/2019	Hydrocarbon emissions were imaged from the tank cover on tank 52.
2	MOV_0048.mp4	5/7/2019	Hydrocarbon emissions were imaged from the agitator on tank 51.
3	MOV_0050.mp4	5/7/2019	Hydrocarbon emissions were imaged from the tank cover on tank 62.
4	MOV_0051.mp4	5/7/2019	Hydrocarbon emissions were imaged from the rupture disc vent of tank 32.
5	MOV_0052.mp4	5/7/2019	Hydrocarbon emissions were imaged from the upper rupture disc on tank 73.
6	MOV_0053.mp4	5/7/2019	Hydrocarbon emissions were imaged from the lower rupture disc on tank 74.
7	MOV_0054.mp4	5/7/2019	Hydrocarbon emissions were imaged from the lower cover seal on tank 73.