**To:** Letuchy, Alexandra[letuchy.alexandra@epa.gov]
**Cc:** Patel, Manojkumar[patel.manojkumar@epa.gov]; Scott Mounts[Scott.Mounts@greif.com]
**From:** Geoff Westphal
**Sent:** Wed 8/23/2017 8:48:06 PM
**Subject:** RE: CLCM (St. Francis) stack testing
Container Life Cycle Management LLC Protocol Revised 082217.pdf

Hi Sasha-

Attached is the latest protocol addressing your questions. For number three, we believe this was already covered under previous submittals so nothing was added. If you need anything else on that topic though, please let me know. Also, regarding the air sampling in your other email, we added that to Section 4.0 under number 8. Thanks!

**Geoffrey Westphal | EHS Manager – North America | Greif** | North America
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PACKAGING SUCCESS **TOGETHER**

**From:** Letuchy, Alexandra [mailto:letuchy.alexandra@epa.gov]
**Sent:** Monday, August 14, 2017 2:22 PM
**To:** Geoff Westphal
**Cc:** Patel, Manojkumar; Scott Mounts
**Subject:** RE: CLCM (St. Francis) stack testing

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Geoff,

Thank you for the revised protocol CLCM resubmit via email on August 4th. EPA has reviewed the protocol and has a few remaining unaddressed comments/concerns:

1) Based on consultation with OAQPS, we are concerned about the explanation provided of how water testing results may be used to develop a response factor for VOC emission rates measured with Method 25A. Method 204F was designed to determine the VOC content in coatings (specifically automotive painting processes) for the purpose of calculating capture efficiency. Beyond the applicability, we would not expect the VOC concentration of the scrubber

water to be sufficient enough to achieve reliable results. We propose that CLCM remove Method 204F testing from the protocol.

2) The report must contain the items listed in section 20.g.ii. of the Section 114 information request. Please note in the protocol all items that will be recorded during the test and reported in the final report.

3) CLCM has to include in the protocol process operating conditions that they would expect to produce the most VOC emissions (as required in section 20.b. of Appendix B of EPA's Section 114 information request, and as described in your test protocol in Item b, under Section 2.0). Are there are any other process operating conditions that CLCM would expect would lead to the most VOC emissions? Specifically, conditions at the paint bake-off oven and conditions related to the cleanliness of the wash water used during the test. If there are other relevant process operating conditions, please include them in the protocol.

Please provide the revised protocol by August 18th and feel free to reach out if you have any questions.

Alexandra (Sasha) Letuchy

Environmental Engineer

Air Enforcement Compliance Assurance Branch MI/WI Section

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312.886.6035

**From:** Geoff Westphal [mailto:Geoff.Westphal@greif.com]
**Sent:** Friday, August 04, 2017 2:58 PM
**To:** Letuchy, Alexandra <letuchy.alexandra@epa.gov>
**Cc:** Patel, Manojkumar <patel.manojkumar@epa.gov>; Scott Mounts <Scott.Mounts@greif.com>
**Subject:** RE: CLCM (St. Francis) stack testing

Hi Sasha-

Attached is the revised protocol. Pages 1 & 2 of the protocol address the items listed in your email. Let me know of any questions – thanks and have a great weekend!

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PACKAGING SUCCESS **TOGETHER**

**From:** Letuchy, Alexandra [mailto:letuchy.alexandra@epa.gov]
**Sent:** Monday, July 31, 2017 10:58 AM
**To:** Geoff Westphal
**Cc:** Patel, Manojkumar; Scott Mounts
**Subject:** CLCM (St. Francis) stack testing

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Geoff,

Thank you for taking the time to discuss the emission testing protocol operating parameters with us last week. As we discussed, CLCM will resubmit the testing protocol or will submit an attachment to the protocol by August 4th, detailing the following:

a. The proposed production rate during the test in drums/hour for both the steel and poly lines. Provide an explanation of how the proposed production rate would produce the most VOC emissions from the emission units. In my experience, facilities usually review past operations to determine the max drums/hour previously processed and then set that as their proposed production rate. Include any such analysis in the protocol.

b. The proposed process operating conditions during the test. Based on our discussions today, CLCM is proposed to run all chemical drums on both the steel line and the poly line. Provide an explanation of how the proposed operating conditions would produce the most VOC emissions from the emission units. Also, include discussion of all other emissions units that will be operating during the test.

c. An explanation of how water testing results may be used to develop a response factor for VOC emission rates measured with Method 25A. Include reference to EPA test methods detailing this procedure.

d. In addition to the items listed in 20.g.ii., EPA asked that CLCM record and report the following for the duration of the test:

1. The vendor name and chemical name for each drum washed during each run; and

2. Drums/hour processed during each run (this would fulfill the requirement to report line speed).

Please note in the protocol all items that will be recorded during the test and reported in the final report.

e. EPA also asked that CLCM make available the RCRA empty container certification for each drum during the test. EPA is not requesting that copies of these certifications be included in the stack test report.

Please let me know if you have any questions,

Alexandra (Sasha) Letuchy

Environmental Engineer

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