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VonRoll WTI
Setting Tomorrow's Standards Today
ISO 9001 ISO 14001

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

January 31, 2008
VIA UPS

Mr. Steve Rothblatt, Director
Air and Radiation Division
U.S. EPA Region V
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604-3507

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
2110 E. Aurora Road
Twinsburg, OH 44087

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

RE: VON ROLL AMERICA, INC.
SEMI-ANNUAL STARTUP, SHUTDOWN, AND MALFUNCTION REPORT &
SEMI-ANNUAL EXCESS EMISSIONS AND CMS REPORT

Greetings:

Please find enclosed a written report entitled *Semi-Annual Startup, Shutdown, and Malfunction Report* and *Semi-Annual Excess Emission and CMS Report* for Von Roll America Inc. These reports are required by 40 CFR 63.10 and cover the time period of July 1 through December 31, 2007.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager

SEMI-ANNUAL STARTUP, SHUTDOWN, AND MALFUNCTION REPORT
&
SEMI-ANNUAL EXCESS EMISSION AND CMS REPORT

for
Von Roll America

January 31, 2008

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	Frank Murray / Vice President & General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Von Roll America, Inc.
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

63.10(d)(5)(i) – Periodic Startup, Shutdown, and Malfunction Reports

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3)

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray – Vice President & General Manager Date: 1/29/08

Signature: [signature]

Section III – Startup, Shutdown, and Malfunction Reports

A. Startup, Shutdown, or Malfunction Actions

All actions taken by Von Roll America, Inc. during startup, shutdown, or malfunction events during the reporting period of July 1, 2007 through December 31, 2007 were consistent with the procedures specified in the facility's Startup, Shutdown, and Malfunction Plan.

B. Malfunctions

Please find in the table below a list of each malfunction, the durations, and a brief description of the type of malfunction that occurred during the reporting period of July 1, 2007 through December 31, 2007.

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	7/2/2007 9:28:21 PM	7/2/2007 10:20:22 PM	Lance Purging - Aqueous	0	52	1	Yes	No	No	No	Yes
Scrubber ECIS Flow	7/3/2007 2:40:21 AM	7/3/2007 2:41:22 AM	Instrument Malfunction - Level Indicator	0	1	1	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/3/2007 3:07:03 PM	7/3/2007 3:07:06 PM	Instrument Malfunction - Quench level indicator	0	0	3	No	Yes	No	No	Yes
THC	7/3/2007 8:32:23 PM	7/3/2007 9:31:22 PM	Waste Feed Anomaly	0	58	59	Yes	No	No	No	Yes
Scrubber ECIS Flow	7/3/2007 8:53:22 PM	7/3/2007 8:57:22 PM	Equipment Malfunction - ECIS	0	4	0	No	Yes	No	Yes	No
Scrubber ECIS Flow	7/3/2007 9:07:26 PM	7/3/2007 9:15:22 PM	Equipment Malfunction - ECIS	0	7	56	No	Yes	No	Yes	No
Lance Atomization	7/5/2007 12:05:58 PM	7/5/2007 12:06:49 PM	Malfunction - Power Outage	0	0	51	No	Yes	No	No	Yes
SDA ECIS Flow	7/5/2007 12:09:22 PM	7/5/2007 12:57:22 PM	Malfunction - Power Outage	0	48	0	No	Yes	No	No	Yes
Scrubber ECIS Flow	7/5/2007 12:15:22 PM	7/5/2007 12:55:22 PM	Malfunction - Power Outage	0	40	0	No	Yes	No	No	Yes
Scrubber ECIS Flow	7/7/2007 7:50:29 AM	7/7/2007 7:57:30 AM	Equipment Malfunction - Carbon Screw	0	7	1	No	Yes	No	No	Yes
THC	7/8/2007 5:39:32 AM	7/8/2007 6:41:29 AM	Waste Feed Anomaly	1	1	57	Yes	No	No	No	Yes
THC	7/9/2007 12:35:29 PM	7/9/2007 1:36:28 PM	Lance Purge - Direct Tanker	1	0	59	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	7/10/2007 8:12:50 PM	7/10/2007 9:12:49 PM	Improper Customer Packaging	0	59	59	Yes	No	No	No	Yes
SCC Pressure Using Seals	7/11/2007 10:52:26 AM	7/11/2007 10:52:30 AM	Waste Feed Anomaly	0	0	4	No	Yes	No	No	Yes
THC	7/12/2007 12:28:35 AM	7/12/2007 1:28:34 AM	Improper Customer Packaging	0	59	59	Yes	No	No	No	Yes
THC	7/14/2007 10:35:28 PM	7/14/2007 11:34:26 PM	Waste Feed Anomaly	0	58	58	Yes	No	No	No	Yes
THC	7/15/2007 4:06:28 AM	7/15/2007 5:13:25 AM	Improper Customer Packaging	1	6	57	Yes	No	No	No	Yes
THC	7/15/2007 2:16:27 PM	7/15/2007 3:14:25 PM	Lance plugging	0	57	58	Yes	No	No	No	Yes
Scrubber pH	7/16/2007 12:51:35 PM	7/16/2007 2:38:31 PM	Equipment maintenance - Caustic Leak	1	46	56	No	Yes	No	Yes	No
Scrubber ECIS Flow	7/19/2007 3:28:30 AM	7/19/2007 3:36:29 AM	Equipment Malfunction - Carbon Screw	0	7	59	No	Yes	No	No	Yes
SDA ECIS Pressure	7/23/2007 2:01:25 PM	7/23/2007 3:25:31 PM	Equipment Malfunction - Carbon Screw	1	24	6	No	Yes	No	Yes	No
SDA ECIS Flow	7/23/2007 2:25:22 PM	7/23/2007 3:25:27 PM	Equipment Malfunction - Carbon Screw	1	0	5	No	Yes	No	Yes	No
SCC Pressure Using Seals	7/24/2007 4:43:50 AM	7/24/2007 4:44:12 AM	Clinker Fell - SCC Brick	0	0	22	No	Yes	No	No	No
THC	7/24/2007 1:29:39 PM	7/24/2007 2:28:58 PM	Waste Feed Anomaly	0	59	19	Yes	No	No	No	Yes
SCC Pressure Using Seals	7/27/2007 3:38:35 AM	7/27/2007 3:38:37 AM	Waste Feed Anomaly	0	0	2	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	8/1/2007 12:09:11 AM	8/1/2007 12:09:29 AM	System Shutdown - ID Fan Bearing	0	0	18	No	Yes	No	Yes	No
RJ DP	8/1/2007 12:21:28 AM	8/1/2007 3:04:35 AM	System Shutdown - ID Fan Bearing	2	43	7	No	Yes	No	Yes	No
SCC Pressure Using Seals	8/1/2007 12:26:01 AM	8/1/2007 12:26:09 AM	System Shutdown - ID Fan Bearing	0	0	8	No	Yes	No	Yes	No
RJ Flow	8/1/2007 12:27:30 AM	8/1/2007 2:23:31 AM	System Shutdown - ID Fan Bearing	1	56	1	No	Yes	No	Yes	No
Kiln Temperature	8/1/2007 12:32:32 AM	8/1/2007 3:06:42 AM	System Shutdown - ID Fan Bearing	2	34	10	No	Yes	No	Yes	No
SCC Pressure Using Seals	8/1/2007 12:35:18 AM	8/1/2007 12:35:23 AM	System Shutdown - ID Fan Bearing	0	0	5	No	Yes	No	Yes	No
Total PB DP	8/1/2007 12:35:30 AM	8/1/2007 3:01:35 AM	System Shutdown - ID Fan Bearing	2	26	5	No	Yes	No	Yes	No
SCC Temperature	8/1/2007 12:39:37 AM	8/1/2007 3:04:30 AM	System Shutdown - ID Fan Bearing	2	24	53	No	Yes	No	Yes	No
RJ Blowdown Flow	8/1/2007 12:58:33 AM	8/1/2007 3:04:33 AM	System Shutdown - ID Fan Bearing	2	6	0	No	Yes	No	Yes	No
SCC Pressure Using Seals	8/1/2007 2:05:59 AM	8/1/2007 2:06:02 AM	System Shutdown - ID Fan Bearing	0	0	3	No	Yes	No	Yes	No
SDA ECIS Flow	8/1/2007 2:19:37 AM	8/1/2007 2:37:30 AM	System Shutdown - ID Fan Bearing	0	17	53	No	Yes	No	Yes	No
SCC Pressure Using Seals	8/7/2007 12:27:53 AM	8/7/2007 12:28:00 AM	Clinker Fell	0	0	7	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/7/2007 12:42:40 AM	8/7/2007 12:42:53 AM	Clinker Fell	0	0	13	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/9/2007 2:13:43 AM	8/9/2007 2:13:51 AM	Clinker Fell	0	0	8	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/9/2007 3:43:54 PM	8/9/2007 3:43:56 PM	Improper Customer Packaging	0	0	2	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	8/9/2007 8:07:29 PM	8/9/2007 9:08:29 PM	Waste Feed Anomaly	1	1	0	Yes	No	No	No	Yes
SCC Pressure Using Seals	8/11/2007 6:15:24 AM	8/11/2007 6:15:26 AM	Improper Customer Packaging	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/11/2007 6:15:29 AM	8/11/2007 6:15:31 AM	Same cause as prior event	0	0	2	No	Yes	No	No	Yes
THC	8/11/2007 6:20:28 AM	8/11/2007 7:19:30 AM	Improper Customer Packaging	0	59	2	Yes	No	No	No	Yes
SCC Pressure Using Seals	8/17/2007 3:39:24 PM	8/17/2007 3:39:27 PM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes
THC	8/17/2007 3:45:56 PM	8/17/2007 4:43:57 PM	Waste Feed Anomaly	0	58	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	8/17/2007 9:17:00 PM	8/17/2007 9:17:03 PM	Improper Customer Packaging	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/20/2007 3:11:19 PM	8/20/2007 3:11:22 PM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes
SCC Temperature	8/21/2007 3:04:19 AM	8/21/2007 3:12:18 AM	Prior AWFCO	0	7	59	No	Yes	No	Yes	No
SCC Pressure Using Seals	8/22/2007 11:57:48 AM	8/22/2007 11:57:51 AM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/22/2007 12:10:30 PM	8/22/2007 12:10:33 PM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/22/2007 1:39:47 PM	8/22/2007 1:39:50 PM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes
SCC Temperature	8/24/2007 3:13:29 AM	8/24/2007 5:55:18 AM	Equipment Malfunction - PA Fan Shutdown	2	41	49	No	Yes	No	Yes	No
Kiln Temperature	8/24/2007 3:22:28 AM	8/24/2007 7:34:37 PM	Equipment Malfunction - PA Fan Shutdown	16	12	9	No	Yes	No	Yes	No

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
RJ DP	8/24/2007 3:34:25 AM	8/24/2007 5:55:25 AM	Equipment Malfunction - PA Fan Shutdown	2	21	0	No	Yes	No	Yes	No
Total PB DP	8/24/2007 4:02:26 AM	8/24/2007 5:55:22 AM	Equipment Malfunction - PA Fan Shutdown	1	52	56	No	Yes	No	Yes	No
RJ Blowdown Flow	8/24/2007 4:05:27 AM	8/24/2007 5:55:20 AM	Equipment Malfunction - PA Fan Shutdown	1	49	53	No	Yes	No	Yes	No
Scrubber ECIS Flow	8/24/2007 4:33:27 AM	8/24/2007 5:55:32 AM	Equipment Malfunction - PA Fan Shutdown	1	22	5	No	Yes	No	Yes	No
SDA ECIS Flow	8/24/2007 4:34:25 AM	8/24/2007 5:55:28 AM	Equipment Malfunction - PA Fan Shutdown	1	21	3	No	Yes	No	Yes	No
MACT - Malfunction Switch	8/24/2007 4:39:49 AM	8/24/2007 5:55:39 AM	Equipment Malfunction - PA Fan Shutdown	1	15	50	No	No	No	No	No
Scrubber ECIS Pressure	8/24/2007 4:40:29 AM	8/24/2007 5:55:35 AM	Equipment Malfunction - PA Fan Shutdown	1	15	6	No	Yes	No	Yes	No
SDA ECIS Pressure	8/24/2007 4:53:48 AM	8/24/2007 5:55:30 AM	Equipment Malfunction - PA Fan Shutdown	1	1	42	No	Yes	No	Yes	No
SCC Pressure Using Seals	8/25/2007 10:22:22 AM	8/25/2007 10:22:30 AM	Waste Feed Anomaly	0	0	8	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/26/2007 8:54:03 PM	8/26/2007 8:54:05 PM	Clinker Fell	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/27/2007 5:09:37 PM	8/27/2007 5:09:46 PM	Waste Feed Anomaly	0	0	9	No	Yes	No	No	Yes
SCC Pressure	9/2/2007	9/2/2007	Waste Feed	0	0	3	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Using Seals	12:27:25 PM	12:27:28 PM	Anomaly								
SCC Pressure Using Seals	9/3/2007 12:03:34 AM	9/3/2007 12:03:40 AM	Clinker Fell	0	0	6	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/3/2007 12:03:42 AM	9/3/2007 12:03:46 AM	Same event as previous	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/3/2007 8:41:49 PM	9/3/2007 8:41:55 PM	Instrument Malfunction - Seal Pressure Sensor	0	0	6	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/3/2007 8:44:34 PM	9/3/2007 8:44:39 PM	Instrument Malfunction - Seal Pressure Sensor	0	0	5	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/3/2007 8:55:35 PM	9/3/2007 8:55:39 PM	Instrument Malfunction - Seal Pressure Sensor	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/6/2007 1:33:18 AM	9/6/2007 1:33:21 AM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes
Scrubber ECIS Pressure	9/6/2007 1:51:25 PM	9/6/2007 2:35:31 PM	Equipment Maintenance - ECIS Motor	0	44	6	No	Yes	No	Yes	No
SCC Pressure Using Seals	9/7/2007 9:53:03 AM	9/7/2007 9:53:25 AM	Instrument Malfunction - Seal Pressure Sensor	0	0	22	No	Yes	No	No	Yes
SCC Temperature	9/16/2007 3:21:36 AM	9/16/2007 3:22:40 AM	Shutdown - Equipment Maintenance	0	1	4	No	Yes	No	Yes	No
Total PB Flow	9/21/2007 9:47:21 AM	9/21/2007 10:14:24 AM	Shutdown - Equipment Maintenance	0	27	3	No	Yes	No	Yes	No
SCC Pressure Using Seals	9/25/2007 8:28:16 AM	9/25/2007 8:28:22 AM	Clinker Fell	0	0	6	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	9/27/2007 11:01:58 AM	9/27/2007 11:02:01 AM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/28/2007 12:49:44 PM	9/28/2007 12:50:02 PM	Shutdown - Draining Slag Quench	0	0	18	No	Yes	No	Yes	No
SCC Pressure Using Seals	9/30/2007 4:52:06 PM	9/30/2007 4:54:21 PM	Instrument Malfunction - Boiler Drum Switch	0	2	15	No	Yes	No	No	No
RJ DP	9/30/2007 5:06:24 PM	9/30/2007 6:05:22 PM	Instrument Malfunction - Boiler Drum Switch	0	58	58	No	Yes	No	No	No
THC	10/1/2007 12:10:24 PM	10/1/2007 1:10:21 PM	Generator Packaging Error	0	59	57	Yes	No	No	No	Yes
THC	10/2/2007 3:49:23 PM	10/2/2007 4:24:23 PM	Waste Feed Anomaly	0	35	0	Yes	No	No	No	No
SCC Pressure Using Seals	10/3/2007 4:41:01 AM	10/3/2007 4:41:04 AM	Clinker Fell	0	0	3	No	Yes	No	No	Yes
THC	10/3/2007 10:29:37 AM	10/3/2007 11:29:37 AM	Waste Feed Anomaly	1	0	0	Yes	No	No	No	Yes
Scrubber pH	10/4/2007 6:20:31 AM	10/4/2007 8:50:34 AM	Shutdown - Scrubber Repairs	2	30	3	No	Yes	No	Yes	No
RJ Blowdown Flow	10/4/2007 6:36:28 AM	10/4/2007 8:41:28 AM	Shutdown - Scrubber Repairs	2	5	0	No	Yes	No	Yes	No
SCC Pressure Using Seals	10/5/2007 1:46:59 PM	10/5/2007 1:47:06 PM	Instrumentation Malfunction - Pressure Ports plugged	0	0	7	No	Yes	No	No	Yes
THC	10/6/2007 10:29:35 PM	10/6/2007 11:07:33 PM	Waste Feed Anomaly	0	37	58	Yes	No	No	No	Yes
SCC Pressure Using Seals	10/7/2007 6:24:42 PM	10/7/2007 6:24:45 PM	Waste Feed Anomaly	0	0	3	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	10/9/2007 9:02:30 AM	10/9/2007 9:02:41 AM	Boiler Plugging	0	0	11	No	Yes	No	No	Yes
THC	10/9/2007 10:25:54 PM	10/9/2007 11:02:27 PM	Waste Feed Anomaly	0	36	33	Yes	No	No	No	Yes
SCC Pressure Using Seals	10/10/2007 10:40:08 PM	10/10/2007 10:40:10 PM	Air In-leakage	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 3:08:39 AM	10/11/2007 3:08:43 AM	Air In-leakage	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 3:26:23 AM	10/11/2007 3:26:25 AM	Air In-leakage	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 4:06:08 AM	10/11/2007 4:06:21 AM	Air In-leakage	0	0	13	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 6:26:23 AM	10/11/2007 6:26:36 AM	Boiler Plugging	0	0	13	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 10:27:55 AM	10/11/2007 10:27:59 AM	Boiler Plugging	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 11:06:11 AM	10/11/2007 11:06:16 AM	Boiler Plugging	0	0	5	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 2:50:58 PM	10/11/2007 2:51:11 PM	Clinker fell	0	0	13	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 3:14:52 PM	10/11/2007 3:14:58 PM	Clinker fell	0	0	6	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 3:24:06 PM	10/11/2007 3:24:19 PM	Clinker fell	0	0	13	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/11/2007 7:50:27 PM	10/11/2007 7:50:35 PM	Boiler Plugging	0	0	8	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/12/2007 11:40:56 AM	10/12/2007 11:41:03 AM	Boiler Plugging	0	0	7	No	Yes	No	No	Yes
THC	11/1/2007 12:54:08 AM	11/1/2007 1:53:49 AM	Lance Plugging	0	59	41	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
RJ Sump Level	11/3/2007 4:03:27 PM	11/3/2007 4:44:25 PM	Instrument Malfunction - Level indicator	0	40	58	No	Yes	No	No	Yes
RJ Blowdown Flow	11/4/2007 9:12:23 AM	11/4/2007 9:20:22 AM	Instrument Malfunction - Level indicator	0	7	59	No	Yes	No	No	Yes
THC	11/13/2007 4:15:33 PM	11/13/2007 5:13:33 PM	Waste Feed Anomaly	0	58	0	Yes	No	No	No	Yes
ESP Inlet Temperature	11/13/2007 5:37:37 PM	11/13/2007 6:00:45 PM	Equipment Malfunction - Atomizer Pump	0	23	8	No	Yes	No	No	Yes
SCC Temperature	11/13/2007 5:38:33 PM	11/13/2007 6:00:43 PM	System Shutdown - Atomizer malfunction	0	22	10	No	Yes	No	Yes	No
Kiln Temperature	11/13/2007 5:48:32 PM	11/13/2007 6:00:41 PM	System Shutdown - Atomizer malfunction	0	12	9	No	Yes	No	Yes	No
ESP Inlet Temperature	12/2/2007 7:52:33 PM	12/2/2007 8:34:47 PM	Equipment Malfunction - Atomizer	0	42	14	No	Yes	No	Yes	No
SCC Temperature	12/2/2007 8:11:32 PM	12/2/2007 8:34:44 PM	Equipment Malfunction - Atomizer	0	23	12	No	Yes	No	Yes	No
Kiln Temperature	12/2/2007 8:23:30 PM	12/2/2007 8:34:42 PM	Equipment Malfunction - Atomizer	0	11	12	No	Yes	No	Yes	No
SCC Pressure Using Seals	12/3/2007 6:06:29 AM	12/3/2007 6:06:31 AM	Waste Feed Anomaly	0	0	2	No	Yes	No	No	Yes
Scrubber pH	12/6/2007 12:30:22 AM	12/6/2007 12:48:22 AM	Equipment Malfunction - Caustic Line	0	18	0	No	Yes	No	Yes	No
RJ DP	12/6/2007 11:06:22 PM	12/7/2007 12:46:23 AM	Equipment Malfunction - Power	1	40	1	No	Yes	No	Yes	No

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
			Outage								
SCC Temperature	12/6/2007 11:16:31 PM	12/7/2007 12:46:34 AM	Equipment Malfunction - Power Outage	1	30	3	No	Yes	No	Yes	No
Total PB DP	12/6/2007 11:20:22 PM	12/7/2007 12:31:21 AM	Equipment Malfunction - Power Outage	1	10	59	No	Yes	No	Yes	No
RJ Flow	12/6/2007 11:20:26 PM	12/7/2007 12:46:28 AM	Equipment Malfunction - Power Outage	1	26	2	No	Yes	No	Yes	No
Kiln Temperature	12/6/2007 11:23:26 PM	12/7/2007 12:46:31 AM	Equipment Malfunction - Power Outage	1	23	5	No	Yes	No	Yes	No
Total PB Flow	12/6/2007 11:26:21 PM	12/7/2007 12:01:24 AM	Equipment Malfunction - Power Outage	0	35	3	No	Yes	No	Yes	No
RJ Blowdown Flow	12/6/2007 11:43:25 PM	12/7/2007 12:46:26 AM	Equipment Malfunction - Power Outage	1	3	1	No	Yes	No	Yes	No
THC	12/7/2007 4:09:21 AM	12/7/2007 5:11:27 AM	Emergency Response	1	2	6	Yes	No	No	No	Yes
RJ DP	12/14/2007 2:46:23 AM	12/14/2007 3:13:23 AM	Equipment Malfunction - Boiler Feed Pump	0	27	0	No	Yes	No	Yes	No
SCC Temperature	12/17/2007 8:58:32 AM	12/17/2007 9:30:40 AM	Equipment Malfunction - Steam Atomization Valve	0	32	8	No	Yes	No	No	Yes
Kiln Temperature	12/17/2007 9:11:34 AM	12/17/2007 9:30:38 AM	Equipment Malfunction - Steam Atomization Valve	0	19	4	No	Yes	No	No	Yes
Kiln	12/17/2007	12/17/2007	Equipment	0	8	2	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Temperature	9:35:40 AM	9:43:42 AM	Malfunction - Steam Atomization Valve								
SCC Temperature	12/17/2007 9:35:42 AM	12/17/2007 9:43:44 AM	Equipment Malfunction - Steam Atomization Valve	0	8	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/18/2007 9:29:29 AM	12/18/2007 9:30:34 AM	Equipment Malfunction - ID Fan Shutdown	0	1	5	No	Yes	No	Yes	No
RJ Blowdown Flow	12/19/2007 7:06:36 AM	12/19/2007 7:06:42 AM	Instrument Malfunction - Flow Transmitter	0	0	6	No	Yes	No	No	Yes
THC	12/22/2007 8:25:32 AM	12/22/2007 9:24:31 AM	Shutdown - Prior AWFCO	0	58	59	Yes	No	No	Yes	No
RJ DP	12/22/2007 8:35:42 AM	12/22/2007 8:40:42 AM	Shutdown - Prior AWFCO	0	5	0	No	Yes	No	Yes	No
RJ DP	12/22/2007 8:45:44 AM	12/22/2007 8:52:43 AM	Shutdown - Prior AWFCO	0	6	59	No	Yes	No	Yes	No
RJ DP	12/22/2007 8:56:45 AM	12/22/2007 8:59:44 AM	Shutdown - Prior AWFCO	0	2	59	No	Yes	No	Yes	No
RJ DP	12/22/2007 9:05:28 AM	12/22/2007 9:12:30 AM	Shutdown - Prior AWFCO	0	7	2	No	Yes	No	Yes	No
RJ DP	12/22/2007 9:19:30 AM	12/22/2007 9:21:31 AM	Shutdown - Prior AWFCO	0	2	1	No	Yes	No	Yes	No
RJ Blowdown Flow	12/24/2007 5:58:22 AM	12/24/2007 8:25:34 AM	Shutdown - Scrubber Repairs	2	27	12	No	Yes	No	Yes	No
Total PB Flow	12/24/2007 6:20:22 AM	12/24/2007 8:25:36 AM	Shutdown - Scrubber Repairs	2	5	14	No	Yes	No	Yes	No
SCC Pressure Using Seals	12/27/2007 3:35:25 PM	12/27/2007 3:35:29 PM	Clinker Fell	0	0	4	No	Yes	No	No	Yes

C. Startup, Shutdown, or Malfunction Plan Revision History

DATE	Revision Number	Comment
9/30/2003	0	Initial Plan
2/27/2004	1	ESP OPLs added. Malfunction list updated.
6/23/2005	2	Revised section on operating modes.
10/27/2006	3	RCRA Permit modifications. Malfunction list updated.
3/15/2007	4	Malfunction list updated and comments added addressing instances beyond the operator's control.
6/6/2007	5	Malfunction list updated and further comments added addressing instances beyond the operator's control.
10/16/2007	6	Corrected minor deficiencies noted by OEPA.

SEMI-ANNUAL EXCESS EMISSION AND CMS REPORT

Section I – General Information

A. Facility Information

Facility ID:	02-15-0233
Responsible Official's Name / Title:	Frank Murray / Vice President & General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Von Roll America, Inc.
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

63.10(e)(3) – Excess Emissions and Continuous Monitoring System Performance Report

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

D. Check the box that corresponds to the reports you are submitting:

☐ Summary Report Only (Complete Sections II and IV)

☒ Excess Emission and CMS Performance Report and Summary Report (Complete Sections II, III, and IV).

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray - Vice President & General Manager Date: 1/29/08

Signature: Frank Murray

Section III – Excess Emissions and CMS Performance Report

A. Excess Emissions

1. Have any excess emissions or exceedances of a parameter occurred during this reporting period? ☒ Yes ☐ No

2. If you answered yes, complete the following table for each period of excess emissions and/or parameter monitoring exceedances, as defined in the relevant standard(s), that occurred during startups, shutdowns, and/or malfunctions of your affected source, or during periods other than startups, shutdowns, and/or malfunctions of your affected source. (63.10(c)(7)-(11))

See next page for completed table.

Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
THC	7/9/2007 7:30:28 AM	7/9/2007 8:28:26 AM	Operator Error - Poor Communication	Reviewed procedure with operator. Restarted unit.	0	57	58
THC	7/19/2007 5:03:28 PM	7/19/2007 5:57:29 PM	Operator Error - Feed Prep	Re-trained technician on prep instructions.	0	54	1
THC	7/30/2007 10:05:27 AM	7/30/2007 11:00:25 AM	Operator Error - Lance Feed	Procedure reviewed with operator. Restarted unit.	0	54	58
SCC Temperature	8/9/2007 8:09:33 AM	8/9/2007 8:17:37 AM	Operator Error	Re-gained temperature using clean fuels	0	8	4
SCC Temperature	8/17/2007 4:55:31 PM	8/17/2007 5:16:02 PM	Operator Error	Regained temperature using gas burner	0	20	31
SCC Pressure Using Seals	8/19/2007 12:04:08 AM	8/19/2007 12:04:13 AM	Operator Error - Drum Feed	Re-gained draft using ID fan damper. Reduced drum weights	0	0	5
SCC Pressure Using Seals	8/19/2007 12:04:16 AM	8/19/2007 12:04:18 AM	same cause as prior event	Re-gained draft using ID fan damper. Reduced drum weights	0	0	2
SCC Pressure Using Seals	8/19/2007 2:35:11 PM	8/19/2007 2:35:13 PM	Operator Error - Drum Feed	Re-gained draft using ID fan damper. Reduced drum weights	0	0	2
SCC Pressure Using Seals	8/19/2007 2:35:18 PM	8/19/2007 2:35:21 PM	Same event as previous	Re-gained draft using ID fan damper. Reduced drum weights	0	0	3
SCC Pressure Using Seals	8/20/2007 12:16:53 AM	8/20/2007 12:16:55 AM	Operator Error - Drum Feed	Removed waste stream from pick list and revised feed prep	0	0	2
SCC Pressure Using Seals	8/20/2007 1:29:27 AM	8/20/2007 1:29:34 AM	Operator Error - Drum Feed	Removed waste stream from pick list and revised feed prep	0	0	7
SCC Pressure Using Seals	8/20/2007 1:29:37 AM	8/20/2007 1:29:39 AM	Same event as previous	Removed waste stream from pick list and revised feed prep	0	0	2
SCC Pressure Using Seals	8/20/2007 11:06:46 PM	8/20/2007 11:06:52 PM	Operator Error - Drum Feed	Re-gained draft using ID fan damper. Reduced	0	0	6

Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
				drum weights			
SCC Pressure Using Seals	8/20/2007 11:06:55 PM	8/20/2007 11:06:57 PM	Same event as previous	Re-gained draft using ID fan damper. Reduced drum weights	0	0	2
SCC Pressure Using Seals	8/21/2007 12:27:16 AM	8/21/2007 12:27:20 AM	Operator Error - Drum Feed	Re-gained draft using ID fan damper. Reduced drum weights	0	0	4
SCC Pressure Using Seals	8/21/2007 2:46:38 AM	8/21/2007 2:46:45 AM	Operator Error - Drum Feed	Re-gained draft using ID fan damper. Reduced drum weights	0	0	7
SCC Pressure Using Seals	8/21/2007 2:46:48 AM	8/21/2007 2:46:58 AM	Same event as previous	Re-gained draft using ID fan damper. Reduced drum weights	0	0	10
THC	8/21/2007 2:53:10 AM	8/21/2007 3:50:28 AM	Operator Error - Feed Prep	Restarted unit. Reduced drum weights	0	57	18
SCC Pressure Using Seals	8/21/2007 3:24:29 PM	8/21/2007 3:24:35 PM	Operator Error - Drum Feed	Restarted unit. Reduced drum weights	0	0	6
SCC Pressure Using Seals	8/21/2007 7:18:16 PM	8/21/2007 7:18:22 PM	Operator Error - Drum Feed	Restarted unit. Reduced drum weights	0	0	6
SCC Pressure Using Seals	8/22/2007 6:31:56 AM	8/22/2007 6:31:59 AM	Operator Error - Drum Feed	Restarted unit. Reduced drum weights	0	0	3
SCC Pressure Using Seals	8/22/2007 6:32:04 AM	8/22/2007 6:32:06 AM	Same event as previous	Restarted unit. Reduced drum weights	0	0	2
THC	8/28/2007 3:07:26 AM	8/28/2007 4:07:27 AM	Operator Error - Feed Prep	Feed prep reviewed. Unit restarted.	1	0	1
SCC Pressure Using Seals	9/6/2007 8:52:44 PM	9/6/2007 8:52:48 PM	Operator Error - Feed Prep	Feed prep reviewed. Unit restarted.	0	0	4
THC	9/11/2007 4:37:00 PM	9/11/2007 5:36:00 PM	Operator Error - Feed Prep	Feed prep instructions to be placed on containers. Restart unit.	0	59	0
SCC Temperature	9/30/2007 5:09:26 AM	9/30/2007 5:38:26 AM	Operator Error - Poor Operation	Regained temperature. Restarted unit.	0	29	0
SCC Pressure Using Seals	10/5/2007 12:45:54 AM	10/5/2007 12:46:00 AM	Operator Error - Poor Feed Mix	Maintain draft using ID fan damper. Revised feed mix	0	0	6

Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
SCC Pressure Using Seals	10/5/2007 1:02:34 PM	10/5/2007 1:02:36 PM	Operator Error - Poor Feed Prep	Review feed prep with technician. Restart unit.	0	0	2
THC	10/5/2007 1:09:33 PM	10/5/2007 2:06:31 PM	Same event as previous	Review feed prep with technician. Restart unit.	0	56	58
SCC Pressure Using Seals	10/5/2007 4:47:05 PM	10/5/2007 4:47:11 PM	Operator Error - Poor Feed Prep	Revise feed prep. Maintain Draft.	0	0	6
SCC Pressure Using Seals	10/5/2007 5:14:32 PM	10/5/2007 5:14:35 PM	Operator Error - Poor Feed Prep	Revise feed prep. Maintain Draft.	0	0	3
SCC Pressure Using Seals	10/5/2007 10:18:22 PM	10/5/2007 10:18:26 PM	Operator Error - Poor Feed Prep	Revise feed prep. Maintain Draft.	0	0	4
Kiln Temperature	10/7/2007 9:12:25 AM	10/7/2007 9:16:25 AM	Operator Error- Poor operation	Regained temperature. Restarted unit.	0	4	0
THC	10/9/2007 11:39:28 PM	10/10/2007 12:40:54 AM	Operator Error - Charge Size	Reviewed feed prep. Restarted unit.	1	1	26
THC	10/11/2007 4:13:23 AM	10/11/2007 4:30:22 AM	Operator Error- Poor operation	Restarted unit.	0	16	59
THC	10/12/2007 1:24:22 PM	10/12/2007 1:41:23 PM	Operator Error - Drum Prep	Reviewed waste stream and feed prep with responsible parties. 11/1/07	0	17	1
THC	10/13/2007 2:23:23 PM	10/13/2007 3:20:21 PM	Operator Error - Drum Prep	Reviewed splitting procedure with personnel	0	56	58
THC	10/13/2007 4:28:22 PM	10/13/2007 5:30:20 PM	Operator Error - Drum Prep	Reviewed splitting procedure with personnel	1	1	58
SCC Pressure Using Seals	11/2/2007 8:46:05 AM	11/2/2007 8:47:43 AM	Operator Error - Boiler Blowdown Procedure	Unit restarted. Operator reviewed procedure 11/2/07.	0	1	38
THC	11/2/2007 8:54:23 AM	11/2/2007 10:00:24 AM	Operator Error - Boiler Blowdown Procedure	Unit restarted. Operator reviewed procedure 11/2/07.	1	6	1
SCC Pressure Using Seals	11/2/2007 8:54:26 AM	11/2/2007 8:54:46 AM	Operator Error - Boiler Blowdown Procedure	Unit restarted. Operator reviewed procedure 11/2/07.	0	0	20
RJ DP	11/2/2007 8:56:22 AM	11/2/2007 9:02:24 AM	Operator Error - Boiler Blowdown Procedure	Unit restarted. Operator reviewed procedure 11/2/07.	0	6	2
SCC Pressure Using Seals	11/8/2007 4:55:09 PM	11/8/2007 4:55:13 PM	Operator Error - Feed prep	Feed prep revised. Unit restarted.	0	0	4
SCC Pressure Using Seals	11/8/2007 4:55:17 PM	11/8/2007 4:55:29 PM	Same event as previous	Same as previous	0	0	12
SCC	11/10/2007	11/10/2007	Operator Error -	Temperature	0	13	59

Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
Temperature	11:31:35 AM	11:45:34 AM	Poor Operation	Regain temp using clean fuels. Unit restarted.			
SCC Pressure Using Seals	11/11/2007 2:48:39 PM	11/11/2007 2:48:44 PM	Operator Error - Drum Prep	Revised drum prep to remove bung and punch metal closed-tops.	0	0	5
SCC Pressure Using Seals	11/12/2007 1:51:51 AM	11/12/2007 1:51:54 AM	Operator Error - Drum Prep	Revised drum prep to remove bung and punch metal closed-tops.	0	0	3
THC	11/24/2007 4:28:23 PM	11/24/2007 5:26:22 PM	Operator Error - Feed prep	Waste stream reduced to 5 gal pails. Restarted unit.	0	57	59
THC	12/14/2007 1:52:24 AM	12/14/2007 2:52:23 AM	Operator Error - Feed prep	Reduced waste stream charge size. Restarted unit.	0	59	59
THC	12/29/2007 4:43:24 AM	12/29/2007 5:44:23 AM	Operator Error - Drum Feed	Reduced feed rate of waste stream. Restarted unit.	1	0	59

B. CMS Performance

1. Has a CMS been inoperative (except for zero/low-level and high-level checks), out of control (as defined in 63.8(c)(7)(i)), repaired, or adjusted during this reporting period? ☒ Yes ☐ No

2. If you answered yes, complete the following table for each period a CMS was out of control, repaired, or adjusted: (63.10(c)(5)-(6), (10)-(12); 63.8(c)(8).

CMS Type	Mfg	Process ID	Start Date	Completion Date	Nature & Cause of Malfunction (if any)	Corrective Actions Taken or Preventative Measures Adopted	Nature of Repairs or Adjustments Made to Inoperable or OOC CMS
THC	Vig	Stack monitor #2	11/1/2007	11/2/2007	Instrument Drift	Manual Calibration	Manual Calibration
THC	Vig	Stack monitor #2	11/19/2007	11/20/2007	Instrument Drift	Manual Calibration	Manual Calibration

3. Indicate the total process operating time during the reporting period. (63.10(c)(13))

Total process operating time (days):

Days in reporting period:	184
Facility total process operating time (days):	159.36
Total days on waste:	150.9
Total days on fuels:	8.36

Section IV – Summary Report – Gaseous and Opacity Excess Emissions and CMS Performance

A. Report Date and Submittal Reporting Period

Indicate the reporting period covered by this submittal and the date of this summary report. (63.10(e)(3)(vi))

Reporting Period beginning date	Reporting Period ending date	Summary Report Date
July 1, 2007	December 31, 2007	January 31, 2008

B. Process Description and Monitoring Equipment Information

Complete the following process description and monitoring equipment information table for each affected source process unit:

Total operating time of affected source during the reporting period (days)
217,303 minutes of unit burning hazardous waste; 12,038 minutes on virgin fuels.

Process unit name
Rotary Kiln Incineration System

Process unit description
Rotary kiln and ancillary equipment for combustion of hazardous wastes.

Emission and/or operating parameter limitations specified in the relevant standards
See Table 1 and 2 below.

TABLE 1 – APPLICABLE EMISSIONS STANDARDS

Emissions Parameter	Limit	Citation
Destruction and Removal Efficiency (DRE)	≥99.99%	40 CFR 63.1203(c)(1)
PCDDs/PCDFs	≤0.20 ng/dscm TEQ basis	40 CFR 63.1219(a)(1)(i)
HCl/Cl_2	≤ 32 ppmv dry as HCl	40 CFR 63.1219(a)(6)
Mercury	≤ 130 μg/dscm	40 CFR 63.1219(a)(2)
Semi volatile Metals (SVM)	≤ 230 μg/dscm	40 CFR 63.1219(a)(3)
Low Volatile Metals (LVM)	≤ 92 μg/dscm	40 CFR 63.1219(a)(4)
Totals Hydrocarbons	≤ 10 ppmv	40 CFR 63.1219(a)(5)(ii)
Particulate Matter (PM)	≤ 0.013 gr/dscf or 34 mg/dscm	40 CFR 63.1219(a)(7)

TABLE 2 – OPERATING PARAMETERS

Process Parameter (Tag ID)	Units	Avg. Period	Basis	Limit 6/18/2004 NOC
Minimum Feed Lance Atomization Pressure[1]	Psig	Instant.	Mfg. Rec.	30
Maximum SCC Pressure (PT-4307 & PT-4308)	In. w.c.	Reference September 4,2003 letter from US EPA Region 5 concerning this requirement.		
Maximum Temperature at ESP Inlet (TI-6002A/B)	°F	1-hr	CPT	428
Maximum Pumpable Waste Feed Rate (WQI-9000T)	Lb/hr	1-hr	CPT	27,988
Maximum Total Waste Feed Rate (WQI-9000F)	Lb/hr	1-hr	CPT	34,026
Minimum Kiln Temperature (TI-4300A/B)	°F	1-hr	CPT	1,760
Minimum SCC Temperature (TI-4310A/B)	°F	1-hr	CPT	1,795
Maximum Process Gas Flow rate (FI-7510A/B)	Scfm	1-hr	CPT	67,581
Minimum Loc. 1 Carbon Feed Rate (WI-7003)	Lb/hr	1-hr	CPT	
Minimum Loc. 2 Carbon Feed Rate	Lb/hr	1-hr	CPT	

[1] Each liquid lance has a pressure switch. When the pressure drops below 30 psig on any lance the feed from that lance will be automatically cutoff. Tag Ids : PSL-3113 (High BTU), PSL-3123 (Organic), PSL-3143 (Aqueous), PSL-3133 (Sludge), PSL-3153 (Slurry), and PSL-3100A/B (Sludge 2).

Process Parameter (Tag ID)	Units	Avg. Period	Basis	Limit 6/18/2004 NOC
(WI-7002)				
Minimum Loc. 1 Carbon Feed Pressure (PI-5732)	Psig	1-hr	CPT	2.9
Minimum Loc. 2 Carbon Feed Pressure (PI-7132)	Psig	1-hr	CPT	3.0
Maximum Ash Feed Rate (WQI-9000AH)	Lb/hr	12-hr	CPT	8,440
Minimum Ring Jet Pressure Drop (DPI-7401)	in. w.c.	1-hr	CPT	27.0
Minimum Scrubber (1st and 2nd Packed Bed, combined) Liquid Flow Rate (FQI-7201)	gpm	1-hr	CPT	1,309
Minimum Scrubber (Ring Jet) Liquid Flow Rate (FI-7404A/B)	gpm	1-hr	CPT	454
Minimum Scrubber (Ring Jet) Blowdown (FI-7403)	gpm	1-hr	CPT	27.0
Minimum Scrubber (Ring Jet) Tank Level (LIC-7401)	feet	1-hr	CPT	1.7
ESP Parameters	The ESP is operating with all fields available with set points of 45,000 volts and 90 sparks per minute, each field; and minimum current of 100 milliamps, each field (see US EPA letters dated Dec. 10 and Dec. 27, 2003).			
Minimum Scrubber (1st and 2nd Packed Bed, combined) Feed Pressure	in. w.c.	1-hr	Mfg. Rec.	Not Req'd.
Minimum Scrubber (1st and 2nd Packed Bed) Pressure Drop	in. w.c.	1-hr	Mfg. Rec.	1.3
Minimum Scrubber (3rd Stage) Liquid pH (AI-7307A/B)	pH units	1-hr	Prior Testing	7.5
Maximum Total Chlorine Feed Rate (WQI-9000CL)	Lb/hr	12-hr	Prior Testing	2,828
Maximum Total Semi volatile Metals Feed Rate (WQI-9000SV)	Lb/hr	12-hr	Prior Testing	77.1
Maximum Total Low Volatile Metals Feed Rate (WQI-9000LV)	Lb/hr	12-hr	Prior Testing	400
Maximum Total Pumpable Low Volatile Metals Feed Rate (WQI-9000PLV)	Lb/hr	12-hr	Prior Testing	400
Maximum Total Mercury Feed Rate (WQI-9000M)	lb/hr	12-hr	Prior Testing	0.82
Stack THC (AI-7850)	ppmv	1-hr	Regulatory Requirement	<10

Monitoring Equipment Information

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
ESP Inlet Temperature	**7/18/07**	Rosemount Transmitter / Thermocouple	Tag # TT-6002A/B (Redundant Instruments)
Kiln / Secondary Combustion Chamber Pressure	**6/20/07**	Rosemount Transmitter / Pressure transducer	Tag # PT-4300A/B (Redundant Instruments)
Kiln Inlet Shroud Pressure	**5/15/07**	Rosemount Pressure transducer	Tag # PT-4307
Kiln Outlet Shroud Pressure	**5/15/07**	Rosemount Pressure transducer	Tag # PT-4306
Kiln Temperature	**3/28/07**	Land CD1 / Laser Thermometer	Tag # TT-4300A/B (Redundant Instruments)
Secondary Combustion Chamber Temperature	**5/30/07**	Land CD1 / Laser Thermometer	Tag # TT-4310A/B Redundant Instruments
Flue Gas Flow Rate (Stack)	**5/22/07**	United Sciences Ultrasonic Gas Flow	Tag #FT-7805 Used in calculation of Process Flow
Flue Gas Flow Rate (Reheat)	**5/22/07**	United Sciences Ultrasonic Gas Flow	Tag #FT-7710 Used in calculation of Process Flow
Flue Gas Flow Rate (Scrubber Outlet)	**5/22/07**	United Sciences Ultrasonic Gas Flow	Tag # FT-7510B This is a redundant instrument for flue gas flow rate. (Redundant with Tag # FI-7510A)
Total Hydrocarbon Analyzer (Stack)	**5/22/07**	VIG Industries FID (Flame Ionization Detector)	Tag # AI-7850A/B (Redundant Instruments)
Scrubber Ring Jet Liquid Flow Rate	**9/7/07**	Rosemount Transmitter / Differential Pressure	Tag # FT-7404 A
Scrubber Ring Jet Liquid Flow Rate	**9/7/07**	Panametrics Ultrasonic Flow	Tag # FT-7404 B
Scrubber First Packed bed flow rate	**9/7/07**	PolySonics Doppler Flow	Tag # FT-7204 A

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Scrubber First Packed bed flow rate	**9/7/07**	Panametrics Ultrasonic Flow	Tag # FT-7204 B
Scrubber Second Packed bed flow rate	**9/7/07**	PolySonics Doppler Flow	Tag # FT-7304 A
Scrubber Second Packed bed flow rate	**9/7/07**	Panametrics Ultrasonic Flow	Tag # FT-7304 B
Scrubber Second Packed Bed Liquid PH	**7/19/07**	Electro-Chemical Devices	Tag # AT-7307A/B
Carbon Feed Rate Loc. 2	**12/15/07**	Generic Load Cell / Loss in Weight Feeder	Tag # WT-7002
Carbon Feed Rate Loc. 1	**12/15/07**	Generic Load Cell / Loss in Weight Feeder	Tag # WT-7003
Carbon Carrier Fluid Pressure Loc. 2	**8/14/07**	Rosemount Transmitter / Pressure	Tag # PT-7132
Carbon Carrier Fluid Pressure Loc. 1	**8/14/07**	Rosemount Transmitter / Pressure	Tag # PT-5732
High Btu Lance Atomizing Pressure	**10/16/07**	Generic pressure switch	Tag # PSL-3113
Organic Lance Atomizing Pressure	**10/16/07**	Generic pressure switch	Tag # PSL-3123
Aqueous Lance Atomizing Pressure	**10/16/07**	Generic pressure switch	Tag # PSL-3143
Sludge Lance Atomizing Pressure	**10/16/07**	Generic pressure switch	Tag # PSL-3133
Slurry Lance Atomizing Pressure	**10/17/07**	Generic pressure switch	Tag # PSL-3153
Sludge 2 Lance Atomizing Pressure	**10/16/07**	Generic pressure switch	Tag # PSL-3100A/B
Pumpable Hazardous Waste Feed Rate	**12/28/07**	Micromotion Mass Flow Meter	Tag # FT-3110 High BTU Lance
Pumpable Hazardous Waste Feed Rate	**12/28/07**	Micromotion Mass Flow Meter	Tag # FT-3120 Organic Lance
Pumpable Hazardous Waste Feed Rate	**12/28/07**	Micromotion Mass Flow Meter	Tag # FT-3140 Aqueous Lance
Pumpable Hazardous Waste Feed Rate	Not Applicable (calculation)	Positive displacement pump	Tag # FT-3150 Slurry Lance
Pumpable Hazardous Waste Feed Rate	Not Applicable (calculation)	Positive displacement pump	Tag # FT-3130 Sludge Lance
Pumpable Hazardous Waste Feed Rate	**12/15/07**	Generic Load Cell (Loss in weight calculation)	Tag # WT-3050 Drum Scale A Feeds Multiple Lances
Pumpable Hazardous Waste Feeds	**12/15/07**	Generic Load Cell (Loss in weight calculation)	Tag # WT-3055 Drum Scale B Feeds Multiple Lances

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Pumpable Hazardous Waste Feeds	**12/15/07**	Generic Load Cell. Loss in weight calculation	Tag # WT-3060 Tanker Scale A (South Bay) Feeds Multiple Lances
Pumpable Hazardous Waste Feeds	**12/15/07**	Generic Load Cell. Loss in weight calculation	Tag # WT-3065 Tanker Scale B (East Bay) Feeds Multiple Lances
Kiln Drum feed Weight Feeder	**12/15/07**	Generic Load Cell (Scale)	Tag # WT-3081 Front wall Drum Scale
Kiln Bulk Feed Crane	**12/15/07**	Generic Load Cell (Scale)	Tag # WT-3105 Front wall Crane Scale
Conveyor Scale Drum Processing	**12/15/07**	Generic Load Cell (Scale)	Tag # WT-3070 Feeds ARTS
Floor Scale Drum Processing	**12/15/07**	Generic Load Cell (Scale)	Tag # WT-3075 Feeds ARTS
Floor Scale Drum Processing Lab Pack	**12/15/07**	Generic Load Cell (Scale)	Tag # WT-3080 Feeds ARTS
Ring Jet Blow Down	**9/7/07**	Panametrics Ultrasonic Flow	Tag # FT-7403A/B
Ring Jet Vessel Level	**(A) 10/21/07** **(B) 10/21/07**	Rosemount Transmitter/ Pressure	Tag # LT-7401A/B
Stack Oxygen Analyzers (wet and dry)	**5/22/07**	Ametek	Tag # AI-7860A/B (Redundant Instruments)
Ring Jet Differential Pressure	**10/22/07**	Rosemount Transmitter/ Pressure	Tag # DPT-7405A/B

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Scrubber 1st Packed Bed Differential Pressure	**10/22/07**	Rosemount Transmitter /Pressure transducer	Tag # DPI-7207
Scrubber 2nd Packed Bed Differential Pressure	**10/22/07**	Rosemount Transmitter /Pressure transducer	Tag # DPI-7307

C. Emission Data Summary

Complete the following emission data summary table for each affected source: (63.10(e)(3)(vi)(I))

Total duration of excess emission / parameter exceedances (minutes for opacity, hours for gases)

Excess Emissions	Total Duration(min)	Total Operating time of affected source during the reporting period (min)	% Of total source operating time during which excess emissions occurred
Maximum Ash Feed Rate (WQI-9000AH)	0	229,341	0.00%
Maximum Process Gas Flowrate (FI-7510A/B)	0	229,341	0.00%
Maximum Pumpable Waste Feed Rate (WQI-9000T)	0	229,341	0.00%
Maximum SCC Pressure (PI-4300A/B)	12.87	229,341	0.01%
Maximum Temperature at ESP Inlet (TI-6002A/B)	65.37	229,341	0.03%

Excess Emissions	Total Duration(min)	Total Operating time of affected source during the reporting period (min)	% Of total source operating time during which excess emissions occurred
Maximum Total Chlorine Feed Rate (WQI-9000CL)	0	229,341	0.00%
Maximum Total Low Volatile Metals Feed Rate (WQI-9000LV)	0	229,341	0.00%
Maximum Total Mercury Feed Rate (WQI-9000M)	0	229,341	0.00%
Maximum Total Pumpable Low Volatile Metals Feed Rate (WQI-9000PLV)	0	229,341	0.00%
Maximum Total Semi volatile Metals Feed Rate (WQI-9000SV)	0	229,341	0.00%
Maximum Total Waste Feed Rate (WQI-9000F)	0	229,341	0.00%
Minimum Feed Lance Atomization Pressure	0.85	229,341	0.00%
Minimum Kiln Temperature (TI-4300A/B)	1,263.85	229,341	0.55%

Excess Emissions	Total Duration(min)	Total Operating time of affected source during the reporting period (min)	% Of total source operating time during which excess emissions occurred
Minimum Loc. 1 Carbon Feed Pressure (PI-5732)	145.8	229,341	0.06%
Minimum Loc. 2 Carbon Feed Pressure (PI-7132)	119.2	229,341	0.05%
Minimum Loc. 1 Carbon Feed Rate (WI-7003)	207.02	229,341	0.09%
Minimum Loc. 2 Carbon Feed Rate (WI-7002)	150.03	229,341	0.07%
Minimum Ring Jet Pressure Drop (DPI-7401)	520.15	229,341	0.23%
Minimum SCC Temperature (TI-4310A/B)	562.9	229,341	0.25%
Minimum Scrubber (1st and 2nd Packed Bed) Pressure Drop	330	229,341	0.14%
Minimum Scrubber (1st and 2nd Packed Bed, combined) Feed Pressure	0	229,341	0.00%

Excess Emissions	Total Duration(min)	Total Operating time of affected source during the reporting period (min)	% Of total source operating time during which excess emissions occurred
Minimum Scrubber (1st and 2nd Packed Bed, combined) Liquid Flow Rate (FQI-7201)	187.33	229,341	0.08%
Minimum Scrubber (3rd Stage) Liquid pH (AI-7307A/B)	274.98	229,341	0.12%
Minimum Scrubber (Ring Jet) Blowdown (FI-7403)	579.18	229,341	0.25%
Minimum Scrubber (Ring Jet) Liquid Flow Rate (FI-7404A/B)	202.05	229,341	0.09%
Minimum Scrubber (Ring Jet) Tank Level (LIC-7401)	40.97	229,341	0.02%
THC	2102.95	229,341	0.92%
ESP Controls	0	229,341	0.00%
Total Duration	**6765.5**	229,341	**2.95%**

Summary of causes of excess emissions / parameter exceedances (% of total duration by cause):

Type	% of total
Startup/shutdown	64.54%
Control Equipment Problems	5.59%
Process Problems	3.59%
Other known causes	17.61%
Other unknown causes	8.67%
TOTAL	100%

D. CMS Performance Summary

Complete the following CMS performance summary table for each affected source: (63.10(e)(3)(vi)(J))

Total duration of CMS downtime[1]
0 minutes

Total operating time of affected source during the reporting period
229,341min

Percent of total source operating time during which CMS were down
0.00 %

[1] Von Roll maintains redundant CMS equipment to prevent CMS downtime.

Summary of causes of CMS downtime (percent of downtime by cause)	
Monitoring equipment malfunctions	0
Non-monitoring equipment malfunctions	0
Quality assurance / quality control calibrations	0
Other known causes	0
Other unknown causes	0

E. CMS, Process, or Control Changes

1. Have you made any changes in CMS, processes, or controls since the last reporting period?
   ☐ Yes ☒No (if no, end of form) (63.10(2)(3)(vi)(K))

2. If you answered yes, please describe the changes below:

END OF REPORT