ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway Suite 120 Atlanta, Georgia 30354 404-363-7000

Effective Date: November 7, 2019

Compliance Monitoring Report

1. General Information

Date of Inspection:

September 25, 2020

Date of Report Completed:

October 7, 2020

Compliance Monitoring Category:

Announced Inspection

Inspector Name:

Sherry Waldron Sow

Reviewing Manager:

Stephen Damaske &

2. Facility Information

Facility Name:

Sterilization Services of Georgia

Facility AIRS No.:

121-00010

Facility Location:

6005 Boatrock Boulevard

Atlanta, Georgia 30336 (Fulton County)

Facility Mailing Address:

Same as above

Facility Contact:

Eric Welch, Plant Manager

404-344-8423

CMS Designation:

Synthetic Minor Source

Air Quality Permit No. 3841-121-0010-S-03-0

Issued for operation of an ethylene oxide sterilization facility and the construction and operation of dry bed reactors (Source Codes DB1 through DB4) to control the sterilization chamber back vents. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

Permit(s) can be accessed at https://permitsearch.gaepd.org/

3. Inspection Summary / Recommended Actions:

The facility appeared to be operating in compliance with Georgia Air Quality Permit No. 3841-121-0010-S-03-0 at the time of the inspection. All records reviewed reflected compliance with the permit.

4. Previous Enforcement Actions and Inspections:

The most recent previous inspection was conducted on January 11, 2018.

Consent Order EPD-AQC-7007 was executed on January 7, 2020 for failing to ensure ethylene oxide emissions reduction of at least 99.0% from the sterilization chamber back vents in the time frame required. The facility finished installing the dry bed reactor control devices. The devices were tested in March 2020 and determined to be in compliance. The Order was resolved on June 23, 2020.

Consent Order EPD-AQC-7039 was executed on September 14, 2020 for failing to reduce ethylene oxide emissions from the aeration room vent by at least 99.0%, for failing to submit all test results to the Division within 60 days of completion of testing, and for failing to conduct testing on the sterilization chamber and aeration room vents without prior EPA approval for alternative methods. Payment of the settlement amount is due within 30 days of execution of the Order.

There have been no other enforcement actions at this facility during the previous five years.

See attached Full Compliance Evaluation (FCE) Report for details.

5. Complaint Investigations since last Full Compliance Evaluation:

There have been no complaints received for this facility in the past five years.

6. Applicable Requirements, Description of Regulated Emission Units, and Inspection Determinations:

	Emission Units	Corresponding	Air Pollution Control Devices	Inspection	
ID No.	Description	Permit Conditions	ID Description No.	Evaluated During Inspection?	Inspection Determination
CH1 CH2 CH3	13 Pallet Ethylene Oxide Gas Sterilization Chamber 8 Pallet Ethylene Oxide Gas Sterilization Chamber 13 Pallet Ethylene Oxide Gas Sterilization Chamber	2.1, 2.2, 2.3, 2.4, 2.7, 3.1, 4.1, 4.2, 4.3, 5.1, 5.4, 6.1, 6.2, 7.1, 7.2, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11	APCD ID No. 1SC – Scrubber	Yes	In compliance.
BV1 BV2 BV3	CH1 Chamber Back Vent CH2 Chamber Back Vent CH3 Chamber Back Vent	2.1, 2.3, 2.6, 2.7, 3.1, 4.1, 4.2, 4.3, 5.1, 5.5, 6.1, 6.4, 7.1, 7.2, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11, 7.12	APCD ID Nos. DB1, DB2, DB3, DB4 Dry Bed Reactors	Yes	In compliance.

	Emission Units	Corresponding	Air Pollution Control Devices	그는 그는 그게 되는 그는 이 집에 되었다. 그 이 그를 가득하고 한다고 있다고 있다. 그 나는	
ID No.	Description	Permit Conditions	ID Description No.	Evaluated During Inspection?	Inspection Determination
AR1 AR2 AR3	Enclosed Outgassing Rooms with Exhausts	2.1, 2.2, 2.3, 2.5, 2.7, 3.1, 4.1, 4.2, 4.3, 4.4, 5.1, 5.2, 5.3, 6.1, 6.3, 6.4, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11	APCD ID No.1OX Catalytic Oxidizer	Yes	In compliance.

7. Compliance Monitoring Activities – Details not included in table above:

- a. Describe any deviation from compliance noted during the inspection listed on Table 6: None identified.
- b. Describe any compliance assistance provided during inspection: None.
- c. Describe any action taken by the facility to come back into compliance during the inspection: N/A
- d. Deviations noted during the inspection, not previously listed. Include equipment ID or equipment description and condition number: None

8. Additional Permit Requirements:

- Periodic Reports:
 See attached Full Compliance Evaluation (FCE) Report for details.
- Permit Fees:
 Paid as required. See attached Full Compliance Evaluation (FCE) Report for details.
- c. Permit Renewal and Expiration: Not Applicable.
- d. For any overall emission/production/usage limit:

	Table 8.d.	
Permit Condition	Permit Limit	Actual
2.1	Limit use of ethylene oxide to 75 tons during any consecutive 12-month period	In compliance. Usage is reported in semiannual reports. All reports indicate the facility is well within this limit. No month in the past 12 reported usage above 6 tons. Current (August 2020) 12-month usage totals of 59.91 tons.
2.4/2.7	Reduce ethylene oxide emissions from each sterilization chamber vent by at least 99.0%. This applies at all times of facility operation.	In compliance. This was demonstrated for the scrubber on May 13, 2020. The control efficiency was demonstrated to be 99.9992%.
2.5/2.7	Reduce ethylene oxide emissions from each aeration room vent by at least 99.0%. This applies at all times of facility operation.	In compliance, Tested March 2020. The catalytic oxidizer outlet was less than 1ppm, in compliance with Subpart O requirements, but not in compliance with the permit reduction requirement. The catalyst was replaced and retested on May 12, 2020. The test demonstrated 99.83% destruction efficiency.
2.6/2.7	Reduce ethylene oxide emissions from each back-chamber vent by at least 99.0%. This applies at all times of facility operation.	In compliance. This was demonstrated on March 11-12, 2020. Test results indicate 99.936% reduction.
3.1	Take reasonable precautions to prevent fugitive emissions of air contaminants.	In compliance. No signs of fugitive emissions were observed during the inspection.

9. Attachments:

- a. Inspection Observations: See attachment
- b. Performance Tests: See attachment
- c. Full Compliance Evaluation (FCE) Report: See attachment
- d. Attachment:
 Records submittals, e-mailed on September 23-24, 2020

Attachment: Inspection Observations

Source Code	Equipment Description & Emissions	Control Equipment & Requirements	Observations	Records
ID No. 1SC	Sterilization Chambers 1 through 3 — Ethylene Oxide	 Measure and record scrubber liquor level in the recirculation tanks weekly using liquid level indicator. Maintain scrubber liquor recirculation tank levels below 9,200 gallons. 	Storage tank level was 7,446 gallons at the time of the inspection. Daily checklists are used to track this.	Previously: Scrubber levels recorded daily. No deviations reported. Daily checklists are used.
ID No. 1OX	Aeration Chambers 1through 3 — Ethylene Oxide	 Catalytic Oxidizer — Compute and record daily (24-hr avg) oxidation temperature. Temperature monitor to be accurate within ± 10°F. Verify accuracy of temperature monitor twice annually using reference thermometer to NIST or calibrated oven. 24-hour oxidation temperature above tested levels or 286°F. 	Oxidation temperature (instantaneous) was at 286.6°F at the time of the inspection. The calibration records were provided and are attached. Strip charts indicate the temperature is consistently above the set point.	No deviations reported.
ID Nos. DB1 DB2 DB3 DB4	Sterilization Chamber Back Vents 1 through 3 Ethylene Oxide	Dry Bed Reactors — • Collect a 15-minute EtO sample from the inlet and outlet of the dry bed reactors and record it. Calculate the destruction efficiency. If less than 99.1%, replace the dry bed material within 15 days	Most recent determination was on 9-23; 100% control efficiency was determined.	Previously not constructed.

	Permit Conditions	Inspection			
	Process Requirement				
4.1	Maintain records of routine maintenance.	In compliance. Records were consistent with compliance with this requirement.			
4.2	Maintain inventory of spare parts.	In compliance. This was provided and is attached.			

	Permit Conditions	Inspection
4.3	Malfunctioning components of air pollution control systems shall be repaired expeditiously by the Permittee.	In compliance. Nothing was observed to indicate noncompliance with this requirement. All components were in good physical condition based on observations at the time of the inspection.
4.4	Conduct yearly (at least once every 12 months) tests during routine operations using the procedures of 40 CFR 63.365(d). If the percent efficiency is less than 99.0%, the Permittee shall restore or replace the catalyst as soon as practicable but no later than 180 days after conducting the performance test. The Permittee shall notify the Division, in writing, of the date the catalyst is restored or replaced within 15 days of such action.	In compliance. The catalyst was replaced on 3/18/2020. The most recent test was conducted on May 12, 2020. The test demonstrated 99.83% destruction efficiency.
5.1	All continuous monitors must be in continuous operation except for breakdowns and repairs.	In compliance. No monitoring downtime reported. Continuous monitoring consists of the thermocouples for the catalytic oxidizer. A strip chart is used to record temperature.
5.2, 5.3, 7.5	Continuously monitor and record temperature at the outlet of the catalyst bed. Temperature must be accurate to within ± 10°F. Verify accuracy of temperature monitor twice annually. Use an independent temp. measurement device. During accuracy checking, use the same location as the monitor being tested; or use a calibrated oven.	In compliance. Strip charts and circle charts were reviewed. The charts show the temperature set point is maintained with very little variation. The thermocouple calibrations from the last two conducted are attached.
5.4	Measure and record scrubber liquor level for Scrubber 1SC weekly. Current recirculation tank level shall be maintained at or below 9,200 gallons.	In compliance. Scrubber level is recorded more frequently than required. Levels are maintained below the requirement.
5.5	Collect a 15-minute EtO sample from the inlet and outlet of the dry bed reactors and record it, once per week. Calculate the destruction efficiency. If less than 99.1%, replace the dry bed material within 15 days. Replacement dates shall be recorded. When sampling, the EO loading to the dry bed reactors, loading out of the dry bed reactor system, and the reduction efficiency determined shall be recorded within 3 hours of the sampling event. Keep records.	In compliance. Records indicate sampling is conducted as required. No issues have been identified with the dry bed reactors through sampling at this time.

	Permit Conditions	Inspection
6.2	Performance test the sterilization chamber vents within 60 days of issuance of the permit and establish the max liquor tank level for the Scrubber. Determine the control efficiency of the scrubber. Test at least once every 12 months.	In compliance. This was demonstrated for the scrubber on May 13, 2020. (Previously in March 2020 as well, but it was retested due to using an alternative method previously unapproved by the EPA). The control efficiency was demonstrated to be 99.9992%.
6.3	Performance test the aeration room vents within 60 days of issuance of the permit and establish the minimum oxidation temperature for the Catalytic Oxidizer. Determine the final exhaust mass emission rate of EtO and the control efficiency of the oxidizer. Test at least once every 12 months.	In compliance. Tested March 2020. The catalytic oxidizer outlet was less than 1ppm, in compliance with Subpart O requirements, but not in compliance with the required reduction. This was addressed with Consent Order EPD-AQC-7039. The catalyst was replaced and retested on May 12, 2020. The test demonstrated 99.83% destruction efficiency.
6.4	Performance test the sterilization chamber back vent dry bed reactors within 60 days of completion of their construction. Determine the final exhaust mass emission rate of EtO and the control efficiency of the dry bed reactors. Test at least once every 12 months.	In compliance. Notification was received on December 12 that these would not be finished in the time required. Consent Order EPD-AQC-7007 was executed to address this. Testing was completed on March 11-12, 2020. Test results indicate 99.936% reduction.
	<u>Recordkeeping</u>	
7.1	Maintain records of start-up, shutdown or malfunctions of air pollution control equipment; periods when CMS or monitoring device is inoperative.	In compliance. Batch records provide traceability for startup and shutdowns. There are actuated valves that automatically shut if there is a problem with the oxidizer. Monitoring devices such as the thermocouple have backup/redundancy.
7.2	Maintain a file of all measurements and all continuous monitoring system performance evaluations, all calibration checks, adjustments and maintenance performed, and all other information required by this Permit.	In compliance. All requested records were available for inspection and/or submittal.

	Permit Conditions	Inspection
7.3	Compute and record a daily average oxidation temperature from the 12-minute or shorter period temperature values. Strip chart data shall be converted to record a daily average oxidation temperature each day any instantaneous temperature recording falls below the minimum temperature.	In compliance. Strip charts/circle charts were reviewed and indicate the temperature does not vary much and is maintained above the setpoint temperature.
7.4	Comply with the recordkeeping provisions of 63.367(d) for the Catalytic Oxidizer.	In compliance. Records reviewed appeared to be complete.
7.5	Maintain general records and continuous monitoring system records as specified in 40 CFR 63.10(b)(2), respectively, and Table 1 of 40 CFR 63 Subpart O.	In compliance. All records reviewed indicated compliance with these requirements.
7.6/7.11	Submit semi-annual reports, including any deviation of operating parameters: 1. Scrubber liquor level for each scrubber (1SC and 2SC) that is above 9200 gallons or subsequent max value established. 2. 24 hour oxidation temperature below 269°F or subsequent min value established 3. System efficiency less than 99.1% for the dry bed reactors 4. Any time the dry bed material is not replaced as required by 5.5. 5.Report total tons of usage and tons of ethylene oxide emissions for each month in the reporting period.	In compliance. Semi-annual reports submitted as required. No deviations reported. Records reviewed were consistent with reports.
7.7/7.8/7.9	Maintain daily records of the usage in pounds of EtO. Calculate the monthly usage in tons. If more than 6.25 tons during any calendar month, notify the Division by the 15 th day of the following month. Notify in writing if over 75 tons.	In compliance. Usage information is provided in reports and all usage is below 6 tons in any given month; no notifications have been necessary.
7.10	Calculate monthly emissions using the equation provided.	In compliance. These are provided in semiannual reports and have been verified.
7.12	Submit a written notification of the actual date of initial startup of the Dry Bed Reactors within 15 days of such date.	In compliance. Notification was received as required.
8.2	Pay annual permit fees.	In compliance. Paid as required.

I arrived at the facility and met with Mr. Welch, Plant Manager, as well as Mr. James Boland, Maintenance Tech. We discussed the purpose of the inspection and started the facility tour. I requested to see the ethylene oxide analyzer, which was new to the facility since the most recent previous formal inspection. The analyzer is operated by Mr. Boland, who showed me the instruction sheet. The instructions include a calibration for each time it is operated. The facility currently uses a methane gas standard to calibrate the machine. The records of each analysis are contained within the system and results are also handwritten on a weekly log.

We next toured the processing areas of the facility, where I observed each permitted unit. We toured the outside area, where the facility's oxidizer and dry bed systems are located. The facility also has an outdoor storage area for EtO drums attached to the side of the building. In each location, I inspected vent systems and components for signs of leakage or poor integrity. No issues were identified. Current parameter readings for the scrubber liquid level and catalytic oxidizer temperature were obtained. Two sterilizers were in operation and no back vents were venting at the time of the inspection.

Some records were requested prior to the inspection in order to minimize the time spent at the facility. The response to the records request referred to equipment repair maintenance procedures and engineering change control procedures. I requested review of these and was able to confirm that maintenance on systems are scheduled to be conducted routinely. For example, a daily inspection and maintenance is conducted on the boiler and vacuum pumps. The air compressor is checked and the chamber door gaskets and switches (valves that automatically shut if the catalytic oxidizer goes down) are checked weekly. The strip chart recorder and air compressor are inspected monthly, and the oxidizer is inspected quarterly. Most work is performed in-house. Spare parts were confirmed to be present on site.

The most recent determination of the dry bed system efficiency was reviewed. It indicated 100% control efficiency. Batch records are used to document periods of startup and shutdown. Selected strip charts and circular charts for the catalytic oxidizer temperature were reviewed; each indicate the temperature is maintained steadily above the temperature set point.

After completing the additional records review, I concluded the inspection and left the facility.

Attachment: Performance Tests

Source Tested	Pollutant	Date of Test	Required Testing Frequency	Limit	Actual	Percent of Allowable
Wet Scrubber	EO	May 13, 2020	Annually	99% reduction efficiency	99.9992%	N/A
Dry Bed Scrubbers	ЕО	March 11- 12, 2020	Annually	99% reduction efficiency	99.936%	N/A
May 12, 2020	ЕО	May 12, 2020	Annually	99% reduction efficiency	99.83%	N/A

Testing was conducted the week of March 10, 2020 for all control devices. The Catalytic Oxidizer, while indicating an outlet concentration of less than 1ppm, did not demonstrate adequate destruction efficiency. The catalyst was replaced and this unit was re-tested in compliance as shown above. In addition, since an alternative test method (to Subpart O) was used to test the sterilization vent scrubber prior to the EPA authorizing the method, the wet scrubber was retested as well. Authorization for the alternative method was issued by the EPA on March 26, 2020.



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Air Protection Branch

4244 International Parkway, Suite 120 Atlanta, Georgia 30354 404-363-7000

Full Compliance Evaluation Report

Sterilization Services of Georgia, Atlanta

121-00010

Facility description: Ethylene-Oxide Sterilizer

6005 Boat Rock Blvd SW

Atlanta, GA 30336

Fulton County

Lat: 33.725, Long: -84.583

Operating status: Operational Classification:

Synthetic minor

CMS status:

SM 3841

SIC code: NAICS code:

333249

Air Programs: Classifications: SIP, MACT None

Full Compliance Evaluation

FCE Year:

2020

FCE tracking number:

10439

Reviewed by:

Waldron, Sherry

Date completed:

29-Sep-2020

On-site inspection conducted

Comments: N/A

Supporting compliance data for September 29, 2019 through September 29, 2020

Inspections

Tracking # Date

Inspector

Reason for inspection

Operating Compliance status

85541

25-Sep-2020

Waldron, Sherry

Planned Announced

Yes

Compliant

RMP Inspections

None

Annual Compliance Certifications

None

Reports

Tracking # Report period

Date received Reviewer

Deviations reported

85368 First Semiannual 8-Sep-2020 No Waldron, Sherry 1-Jan-2020 - 30-Jun-2020 Comments: Subpart O, deviation, EO usage/emissions report 83225 Second Semiannual 3-Mar-2020 Waldron, Sherry Νo 1-Jul-2019 - 31-Dec-2019 Comments: Email copy received on 2/28/2020. Requested additional information per new Condition 7.11 requested via e-mail on 3/11/2020. Acceptable version received via email 4/15 81620 Other 12-Dec-2019 Waldron, Sherry Yes 25-Dec-2019 Comments: Notification that facility not able to meet deadline of December 31, 2019 for intalling controls on sterilization chamber back vents as required by Permit Condition 5.5.

Notifications

None

Source Tests

Tracking #	Test Ref#	Date received	Reviewer	Compliance status
84635	202000807	28-Jul-2020	Waldron, Sherry	In Compliance
	Source tested:	Ethylene Oxide - 6	Chemroxx Wet Scrubbe	er (Stack ID EP4)
84634	202000806	28-Jul-2020	Waldron, Sherry	In Compliance
	Source tested:	Ethylene Oxide - /	Anguil Catalytic Oxidize	r (Stack ID EP5)
84213	202000547	12-Jun-2020	Waldron, Sherry	Not In Compliance
	Source tested:	Ethylene Oxide - 0	Catalytic Oxidizer EP5	
84212	202000546	12-Jun-2020	Waldron, Sherry	In Compliance
	Source tested:	Ethylene Oxide - I	Ory Bed Scrubber EP1	
84211	202000545	12-Jun-2020	Waldron, Sherry	Indeterminate
	Source tested:	Ethylene Oxide - S	Scrubber EP4	

Fees Data

Fee year	Invoiced amount	Amount paid	Balance Status
•		•	
2019	\$2,100.00	\$2,100.00	\$0 Paid in Full
2018	\$1,731.45	\$1,731.45	\$0 Paid in Full
2017	\$1,700.00	\$1,700.00	\$0 Paid in Full
2016	\$1,700.00	\$1,700.00	\$0 Paid in Full
2015	\$1,700.00	\$1,700.00	\$0 Paid in Full

Five-Year History of Enforcement Actions

Tracking #	Staff responsible	<u>Date</u>	Туре
2439	Waldron, Sherry	14-Sep-2020	Consent Order #EPD-AQC-7039
2364	Waldron, Sherry	7-Jan-2020	Consent Order #EPD-AQC-7007

Waldron, Sherry

From:

ewelch@sterilization-services.com

Sent:

Thursday, September 24, 2020 2:05 PM

To:

Waldron, Sherry

Subject:

RE: Records request for submittal by September 23

Attachments:

Emissions equipment parts list.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sherry,

Please let me know if there is anything else.

Eric Welch
Plant Manager
Sterilization Services of Georgia
6005 Boat Rock Blvd. SW
Atlanta, GA 30336
office 404-344-8423
fax 404-344-8665
cell 404-973-9645
EWELCH@STERILIZATION-SERVICES.COM

From: Waldron, Sherry <Sherry.Waldron@dnr.ga.gov>

Sent: Thursday, September 17, 2020 3:02 PM

To: Eric Welch (SSG) <ewelch@sterilization-services.com> **Subject:** Records request for submittal by September 23

Importance: High

As discussed, the Division is requesting submittal of records prior to an on-site inspection scheduled for your facility. The records are meant to spot-check select records in order to ascertain the facility's compliance with Georgia Air Quality Permit No. 3841-121-0010-S-03-0.

Please submit, both electronically by e-mail to me as well as paper copies to the Division for our files, the following records by Wednesday, September 23, 2020:

- EtO usage for July and August 2020 (P.C.s 7.7, 7.8)
- Weekly scrubber liquor tank liquid level from the months of March 2019 of July 2020 (P.C. 5.4)
- Records of daily 24-hour average oxidation temperature for the catalytic oxidizer for March 2019 and July 2020 (P.C.s 5.2, 7.3, 7.4, and 7.5)
- Records of the most recent two accuracy verifications for the catalytic oxidizer thermocouple (P.C. 5.3)
- Documentation that the accuracy of the catalyst temperature monitor is within ±10°F (P.C. 5.2)
- Weekly records of the EtO inlet and outlet sampling of the dry bed reactors, and the calculated destruction efficiency (P.C. 5.5), for the time period of June and July 2020.
- The list of spare parts inventory for control equipment (P.C. 4.2).

- What method does the facility use to schedule routine maintenance? Repairs? (P.C.s 4.1, 4.3)
- Describe how the facility maintains records of startup, shutdown, or malfunction of air pollution control equipment; and periods when continuous monitoring systems or monitoring devices are inoperative, in compliance with P.C. 7.1.

Thank you for your assistance.

Sincerely,

Sherry Waldron Environmental Engineer Georgia Environmental Protection Division Air Protection Branch 404-362-4569

Emissions equipment parts list

<u>Scrubber</u>

Flow Control Valve and Actuator

Recirculation Valve and Actuator

Reactor Tank Selector Valve and Actuator

Heat Exchanger

Spare pumps and motors

<u>Oxidizer</u>

Oxidizer temperature probe

200 watt motor

Belts

Relay module Honeywell

Limit controllers

Dry bed reactors

Motor

Belts

Catalyst

Filters

Waldron, Sherry

From:

ewelch@sterilization-services.com

Sent:

Wednesday, September 23, 2020 5:17 PM

To:

Waldron, Sherry

Cc:

JBoland@Sterilization-Services.com; 'Tammie Brenner'

Subject:

RE: Records request for submittal by September 23

Attachments:

Oxidizer calibration.pdf; 3225_001.pdf; 2019_001.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sherry,

I apologize for getting this to you so late. I had went on vacation on the 17th and had just read the email this morning. If you need anything else please let me know.

Eric Welch
Plant Manager
Sterilization Services of Georgia
6005 Boat Rock Blvd. SW
Atlanta, GA 30336
office 404-344-8423
fax 404-344-8665
cell 404-973-9645
EWELCH@STERILIZATION-SERVICES.COM

From: Waldron, Sherry <Sherry.Waldron@dnr.ga.gov>

Sent: Thursday, September 17, 2020 3:02 PM

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Please submit, both electronically by e-mail to me as well as paper copies to the Division for our files, the following records by Wednesday, September 23, 2020:

- EtO usage for July and August 2020 (P.C.s 7.7, 7.8)
 July (7163.3 lbs.)
 August (10,729.5 lbs.)
- Weekly scrubber liquor tank liquid level from the months of March 2019 of July 2020 (P.C. 5.4) Attached.
- Records of daily 24-hour average oxidation temperature for the catalytic oxidizer for March 2019 and July 2020 (P.C.s 5.2, 7.3, 7.4, and 7.5) Attached. Same form as daily scrubber tank level.
- Records of the most recent two accuracy verifications for the catalytic oxidizer thermocouple (P.C.
 5.3) Attached

- Documentation that the accuracy of the catalyst temperature monitor is within ±10°F (P.C. 5.2) Same as above.
- Weekly records of the EtO inlet and outlet sampling of the dry bed reactors, and the calculated destruction efficiency (P.C. 5.5), for the time period of June and July 2020. Attached
- The list of spare parts inventory for control equipment (P.C. 4.2). Will send this first thing in the morning.
- What method does the facility use to schedule routine maintenance? Repairs? (P.C.s 4.1, 4.3) Maintenance is determined by procedures and frequency required.
- Describe how the facility maintains records of startup, shutdown, or malfunction of air pollution control equipment; and periods when continuous monitoring systems or monitoring devices are inoperative, in compliance with P.C. 7.1. Equipment repair procedure and engineering change control procedure.

Thank you for your assistance.

Sincerely,

Sherry Waldron Environmental Engineer Georgia Environmental Protection Division Air Protection Branch 404-362-4569

Sterilization Services of Georgia SEMI-ANNUAL OXIDIZER MAINTENANCE INSPECTION AND CALIBRATION

OXIDIZER THERMOCOUPLE CHECK: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089	Beta calibration due date 10/20		
Oxidizer recorder	As Found (Beta attached to TC)	Deviation	*As Left
288.4	288.0	+ 0.4	288.4
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

HONEYWELL OXIDIZER INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

Beta serial #_1678089	Beta calibration	due date 10/20	
Test temperature	200°F	250°F	300°F
Honeywell recorder as found reading	201.0	251.0	301.0
Beta reading	200.0	250.0	300.0
Deviation	+ 1.0	+ 1.0	± 1.0
*As left reading	201,0	251.0	301.0

YOKOGAWA INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

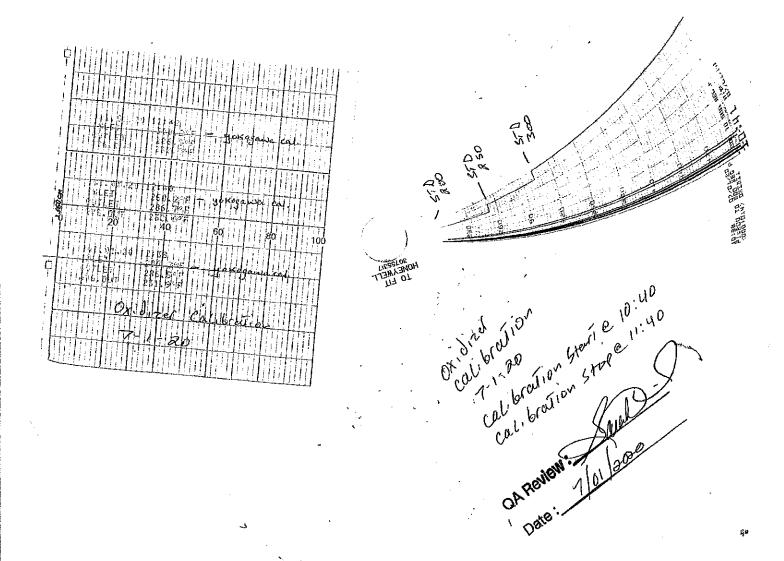
Form: F-SOPG.9.09.05-02

Beta serial # 1678089	eta serial # 1678089 Beta calibration due date 10/20				
Test temperature	200°F	250°F	300°F		
Yokogawa as found reading	200.2	250.2	300.2		
Beta reading	200.0	250.0	300.0		
Deviation	+ 0.2	+ 0.2	+ 0.2		
*As left reading	200.2	250.2	300.2		

*If as found reading is within the acceptance criteria the as left reading is not required. As left reading is required when there is an adjustment.

Abnormal Operations: N/A	
Comments:	
N/A	
Performed by: aug She	Date: 07/01/20
Plant Manager:	Date: 7-1-20 Date: 1/01/2020
Quality Assurance: Mahka	Date:7 <u>/01/2020</u>
,	

Revision: 002



Sterilization Services of Georgia SEMI-ANNUAL OXIDIZER MAINTENANCE INSPECTION AND CALIBRATION

OXIDIZER THERMOCOUPLE CHECK: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089	Beta calibration due date 10/20		
Oxidizer recorder	As Found (Beta attached	As Found (Beta attached Deviation	
	to TC)		
277.2	277.0	+ 0.2	277.2
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

HONEYWELL OXIDIZER INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

Beta serial # 1678089	Beta calibration	due date 10/20	
Test temperature	200°F	250°F	300°F
Honeywell recorder as found reading	201.0	251.0	301.0
Beta reading	200.0	250,0	300.0
Deviation	+ 1.0	+ 1.0	+ 1.0
*As left reading	201.0	251.0	301.0

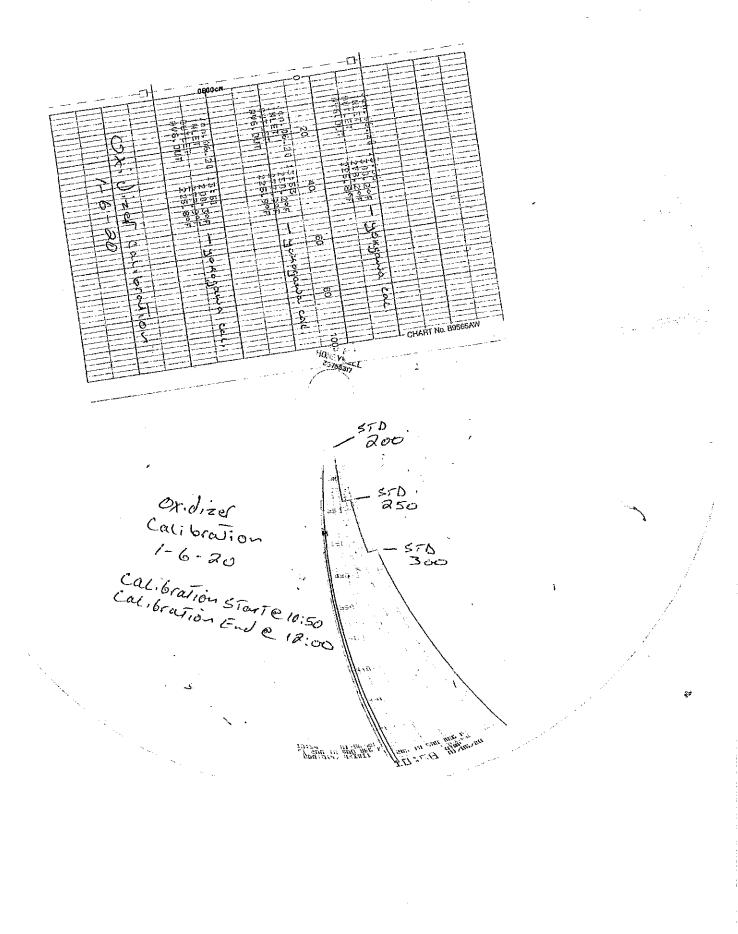
YOKOGAWA INSTRUMENTATION CALIBRATION: ACCEPTANCE CRITERIA +/- 2° F

Form: F-SOPG.9.09.05-02

Test temperature	200°F	due date 10/20 250°F	300°F
Yokogawa as found reading	200.3	250.2	300.2
Beta reading	200.0	250.0	300.0
Deviation	+ 0.3	+ 0.2	+ 0.2
*As left reading	200.3	250.2	300.2

Abnormal Operations: N/A	
Comments: N/A	
	0.4 (0.0.10.0
Performed by:	Date: 01/06/20 Date: 1-6-20
Quality Assurance: Jalel	Date: <u> 1-6-20</u>

Revision: 002



Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer.
- 2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
- 3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- 4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- 7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: #03		%Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal		
	Before DBR PPM-	After DBR PPM:	Results: 100 75		
į	147.9572	-0.766			
	Blower in use: £1	1	Sample Complete Time/Date	Final Completion Time/Date	
			09:55 6-25-20	11:20 6-25-20	
	e results (% Removal) yes: Plant Manager and) less than 99.1%? QA/RA Manager mu	Yes No		
	Date notified:	n/A	fnitials:	The state of the s	•
•	Dry Bed Material n	nust be replaced with	in 15 days. Date Replaced_	n/a	· Alexandra
Ifı	no, no further action r	required.		·	ì
Comn			•		
<u></u>)		404		
Inspect	ed bys aune	25.J	Date: £	1-25.20	T WALL
Plant M	lanager;	A	Date: 4	, -25-2020	
QA Rev	view Sunh	Danis &	Date: 4	1/25/2020	
	<i>'</i>)				**************************************

Form: F-SOPG.9.09,02-02

Rev. 002

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer.
- Acquire 2 Tedlar style sample bags at least 101, in size. Label one sample bag "Before" and the other "After".
- 3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- 4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- 7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: # 0		%Removal ((After DB) divided by (Before DB) X 100) = % not removed (160%) minus (% not removed) = % Removal		
	Before DBR PPM:	After DBR PPM:	Results: 100 90		
	132-1288	0.7578			
	Blower in use: 324		Sample Complete Time/Date	Final Completion Time/Date	
		7	•	17:30 6.18-20	
	e results (% Removal) yes: Plant Manager and) less than 99.1%? , QA/RA Manager mu	∑ Yes ∑ No st be nótified.		
	Date notified:	nja	Initials:	The second secon	-
4			in 15 days. Date Replaced		e San
If:	no, no further action i	•		•	i.
	nents:				
42.4 SOCIETY AND 1400A	and the state of t	Afel			
Inspect	iediby: Jause	& (Sales)	Date: 6	5-18-20	
Plant M	lanagery		Date:	1-19-20	
QA Re	view: Sansi	hQ.()	Date:	0/19/2020	
	~)			, ,	

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Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer.
- Acquire 2 Tedlar style sample bags at least 101 in size. Label one sample bag "Before" and the other "After".
- 3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- 4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- 7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use:		%Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal			
	Before DBR PPM;	After DBR PPM:				
	138-8836	-0.7902				
1	Blower in use: 17 1		Sample (Complete Time/Date	Final Completion Time/Da	te
	TO ACCUMANCE AND	A STATE OF THE PARTY OF THE PAR	13:59	6-11-20	15:30 6-11-	Ad
	e results (% Removal) l yes: Plant Manager and Q	- ,		es 🔀 No fied.		
	Date notified:					¥
•	Dry Bed Material mu	st be replaced withi	in 15 days	s. Date Replaced		****
If	no, no further action red	juired.				
Comn		1/1				
Inspect	ed by:	F3/S4)	Date:/	5-11-20	
Plant ly	lannger -			Date; <u></u>	e-11-20	
QA Rei	view.	h(1.)		Date:	6/11/2020	
·		100AA1400000000000000000000000000000000		**************************************		

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Rev. 002

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer.
- 2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
- 3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- 4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed ,
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- 7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: #/ Q /		% Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal	
	Before DBR PPM: After DBR PPM:		Results: 100 %	
	293.6201	-0.7422		
	Blower in use:		Sample Complete Time/Date 09:54 6-3-20	Final Completion Time/Date 6-3-20 11: 20
		QA/RA Manager mu	Yes No st be notified. Initials:	THE SAME About Substitute (SAME SAME SAME SAME SAME SAME SAME SAME
4	Dry Bed Material n	oust be replaced withi	in 15 days. Date Replaced	n/A
If	no, no further action r	equired.		
Comn		nta .	· · · · · · · · · · · · · · · · · · ·	
Inspect	ed by Lau		Date:	1
Plant M	lanager: Filan	h Dani	Date: O	6-3-20 1/03/2020
	N. C.			,

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Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer.
- 2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
- 3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- 4. Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed ,
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- 7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: 44 c	%Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal				
	Before DBR PPM:	After DBR PPM:	Results:	100 %	<u>.</u>	***************************************
	101,38,4	-0.9182				
	Blower in use:	recognition and the second	Sample Com	plete Time/Date	Final Completion Time	/Date
	And the second s		09:48	7-31-20	11:30 7-31	-20
	e results (% Removal) l yes: Plant Manager and Q	- -	Yes[~	·	
	Date notified:	1/1	Initials:	<u>n 1</u>	ovan kankin hansa vasan da da suranda suranda suranda sa	.40
a	Dry Bed Material mu	st be replaced with	in 15 days. D	Date Replaced	A	
If	no, no further action red	quired.			·	· ·
Comn	nents:	1		rom All Schallerink Community of the Schallering Code		FC\$4684134444 \$400.33
Inspect	ed by: Aus	285/4		Date:	7-31-20	
Plant M	fanager:		=)	Date:	7-31-20	Marine, Teleponeur and an experience of the second
QA Re	view: Jacas	h()-1	<u>/</u>	Date:	7/31/2000	and the second s
	<i>V</i>				T = U'	

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Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer.
- 2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
- Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed ,
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: #02		%Removal ((After DB) divided by (Before DB) X 100) = % not enoved (100%) minus (% not removed) = % Removal			
	Before DBR PPM:	After DBR PPM:	Results: 100 St	y		
	17. 4741	-0,8865			,	
	Blower in use: ## /	•	Sample Complete Time/Date	Final Completion Time/Date		
		The state of the s	11:00 7-24-20	12:30 7-84-80		
	e results (% Removal) yes: Plant Manager and (:	Yes No . ast be notified.			
	Date notified:	n/d	Initials:		44	
đ			in 15 days. Date Replaced	n/0	- 4	
	no, no further action re	equired.	`			
Comn			Trick and the control of the control			
Inspect	ed by: farm	2(8,1	Date;	7-24-20	### · · · · · · · · · · · · · · · · · ·	
	fanager:	4		7-24-20	************	
QA Rev	view: Sarah	<u> </u>	Dnto:	7/27/2620		
	<i>E</i>					

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Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer,
- 2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
- 3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed ...
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- 7. After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: 😝 📀	3	%Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal				
	Before DBR PPM:	After DBR PPM:		2			
	248.8006	-0.7862					
j	Blower in use: 😝 1		Sample Complete Time/Date	Final Completion Time/Date			
		ورسيد من من المراجعة	15:23 7-17-20	17:00 7-17-80			
	e results (% Removal) yes: Plant Manager and (~	Yes No				
	Date notified:	^/4	Initials:afd	Part & San	•		
Ė	Dry Bed Material m	ust be replaced with	in 15 days. Date Replaced	n/A	****		
Ifr	no, no further action re	quired.			**		
Comm		010			and draft proposed about		
The absolute contractions and the same of							
Inspecte	ed by	<u> </u>	Date:	7-17-20	·1		
Plant M	lanager:		Date:	7-21-20			
QA Rev	New: Saras	(w). X	Date:	7/21/2020			
	/						

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Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

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- 3. Place both bags inside vacuum chamber and connect to corresponding sample lines inside vacuum chamber. Open sample bag valves approximately 1 full turn.
- Connect Before (whichever blower is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
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- 6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed ___
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- 7. After 15-minute timer expires:

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- a. Close flowmeter valves
- b. Turn off vacuum pump
- c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: ## 0	%Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal				
	Before DBR PPM:		Results: 100 %			
	35.6294	-0.8057				
	Blower in use:		Sample Com	plete Time/Date	Final Completion Time/Date	
	at re-resident disklik social-		15:55	7-9-20	17:20 7-9-80	
	e results (% Removal) b yes: Plant Managor and Q		Yes [] ist be notified			
	Date notified:	<i>H</i>	Initials:	10		•
•	Dry Bed Material mu	st be replaced with	in 15 days. D	ate Replaced	a10	. مانعمر
Ifr	no, no further action rec	•				à
Comm	nents:		7			1. 114-45 3.24-4
)			BIEG C DANIALISANA MARAMARANANANA MARAMARANANANA MARAMARANANANANANANANANANANANANANANANANA		
Inspecte	ed by: /aul	Q/S/6c	<u>) </u>	Date;	7-9-20	·
Plant M	lanager:			Date:	7-13-20	
QA Rev	riew: Sarah	Da:	<u> </u>	Dato:	1/14/2020	

Rev. 002

Weekly Inspection Dry Bed Reactor (DBR) Compliance Checks

DRY BED REACTOR COMPLIANCE CHECKS

- 1. Follow manufacturer guidelines to prepare analyzer instructions to be with the analyzer.
- 2. Acquire 2 Tedlar style sample bags at least 10L in size. Label one sample bag "Before" and the other "After".
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- 5. Connect After (whichever chamber is in use) sample lines to vacuum chamber through corresponding flow meters. Make sure flow meter is closed.
- 6. When the chamber door is opened after cycle completion:
 - a. Turn on vacuum pump with vacuum pump flow control closed
 - b. Open flowmeter valves fully
 - c. Open vacuum pump flow control to set flowmeters to approximately 0.5 ppm.
 - d. Start 15-minute timer. Continuously monitor flowmeters so no to exceed 0.5 ppm.
- After 15-minute timer expires:
 - a. Close flowmeter valves
 - b. Turn off vacuum pump
 - c. Document sample time complete (sample must be tested and documented within 3 hours of the sample complete time.
- 8. Document final completion time of the analyzation of the samples.

	Chamber in use: 42 p		%Removal ((After DB) divided by (Before DB) X 100) = % not removed (100%) minus (% not removed) = % Removal				
	Before DBR PPM:	After DBR PPM:	Results: 100 9	2)			
	145.7677	-0.7505					
	Blower in use: 17/	The same of the sa	Sample Complete Time/Date	Final Completion Time/Date			
	No. and the Restaurant	Per Balling Manager Anna Carlotte	10:00 7-2-80	11:40 7-2-20			
		QA/RA Manager m	Yes No ust be notified. Initials: 15 days. Date Replaced		****		
If	no, no further action r			·	*		
Comm		A/A			·····		
Inspect	ed by hut	35)	Date:	7-2-20			
Plant M	lanager:		Dato:	7-13-20	Mar die geleckie gefenen glieb er gelecke gebe		
QA Rev	iew Jaras	habrin	Date:	1/14/2020			
	/			. ,			

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LIQUID SCRUBBER INSPECTION

Scrubber pH;	· · · · · · · · · · · · · · · · · · ·	Z (Should	d be less than 1.0,	if greater than 1.0 a	dd sulfuric acid and	notify Plant Manager
Control panel	l lamp test perfo	rmed. NYes [J No	ing properly? (سا		
			arm ngms work nd actions taken		tes ij no (in/	A
		*		•	ola	
					•	
ernama autor en estadologa estronomo - autobaso		COM	IPLIANCE LE	VEL CHECKS	<i></i>	· · · · · · · · · · · · · · · · · · ·
Flow Rate (70 ± 5 gpm) from Chemrox	Tawer Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
control panel			Inches	Inches	Inches	
70	100	lon	82	58	3 4563	
1.12		40	Gallons	Gallons	Gallons	<u> </u>
	N/A		3827		2947	84.7
			arge form to be nust be notified.	attached) □ Date notified:	Yes ⊌ No	Initials:
	•		XIDIZER INS		et jet	
Has the oxid For the perio	lizer been turne ods of time that	ed off since the t the oxidizer is	s turned on: is	ection? □ Yes the temperature		<u>⊪</u> Yes □ No
			s? □ Yes □ 1			
Abnormal co	ınditions; <u>-</u> -	10	***************************************			
		ALL STREET, ST			***************************************	THE STATE OF THE S
VIII.						
Comments:						1
	- Kilfeli				and the same state of the same	
		7		· · <u>- · · · · · · · · · · · · · · · · ·</u>		
nspected by:		428YS		Date:	7-31-20	
Plant Manage	1 422		\bigcirc	Date:	7-31-2	<u> </u>
QA Reviews_	Sarak	<u> </u>		Dute:	7/31/2020)
•					/ /*	
	ODG 0 00 01	02	**************************************	**************************************	-constructive and constructive and ambiently graph of the section	
rorm: F-S0	OPG.9.09.01	-02	Rev. 00	12		Page 1 of 1

LIQUID SCRUBBER INSPECTION

			d actions taken f			
			1000			
			PLIANCE LEY			
Flow Rate 0 ± 5 gpm)	Tower Temp. (60-80°F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
from Chemrox ontrol panel	- California of Spanish Spanish		Inches	Inches	Inches	
	,		70	115	66	~14
70-	60	60	Gallons	Gallons	Gallons	
	MA	(completed rec	3267	3,858	Yes D No	8395
			OXIDIZER IN			
he oxidized as the oxidized or the per	er may be turn dizer been tur liods of time th licient paper c conditions:	ed on or off, de ned off since th at the oxidizer on both recorde	epending on proper last daily instantial ins	spection needs. spection? □ Yes the temperature	s □-N o e above 269 °F?	Yes 🗆 No
he oxidized as the oxidized or the per	er may be turn dizer been tur lods of time th Ticlent paper o	ed on or off, dened off since that the oxidizer on both recorde	oxidizer in open ding on proper daily instantial instantial in turned on: its tur	spection needs. spection? □ Yes the temperature	es □No e above 269 °F?	Yes No
he oxidize (as the oxi for the per s there sul	er may be turn dizer been tur iods of time the icient paper conditions:	ed on or off, dened off since that the oxidizer on both recorde	oxidizer in open ding on proper daily instantial instantial in turned on: its tur	spection oduction needs. spection? □ Ye s the temperature No	es □No e above 269 °F? : 7.30-	Yes No

LIQUID SCRUBBER INSPECTION

		rmed, 🔽 Yes 🗆 oulbs, Are all ala		ng properly? 🍱	Yes □ No □N/.	A
•	alarm condition	ns (list alarms an	d actions taken	for each):		
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			PLIANCE LEY	VEL CHECKS	J	
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
John St. Parity	And any makeur mankeur bereat He of Market market bereat de la late de late de la late de late d		Inches	Inches	inches	A. A
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กุร	n/A	1,14	3500 arge form to be	1898	2947	8345
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las the oxid	lizer been turne ods of time that	ed off since the	•	ection? Yes the temperature	above 269 °F?	√Yes □ No
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nspected by:	A A			Date:	7-29-80	
	parties of the same				7-29-0	7)
Plant Manage QA Reviews	Lucar	10		Date:Date:	7/29/2020	

LIQUID SCRUBBER INSPECTION

	·		arm lights worki	ing properly?	Yes □ No □N/	A
Control pane		•	nd actions taken	for each):		
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		·	IPLIANCE LE			
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
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grunder rech	iarge necessary (completed rech	arge form to be a	attached)	Yes I No	
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f yes, Plant N	arge necessary (Aanager and QA	/RA Manager n	nust be notified.	Date notified:	Yes I No	Initials:
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f yes, Plant Market Plant Marke	Manager and QA may be turned lizer been turned ods of time that cient paper on anditions:	/RA Manager n O d on or off, depend off since the the oxidizer is both recorders	pending on proceed as turned on; is the ending on proceed as the ending of the end of the en	Date notified:	No above 269 °F?	9 Yes □ No
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The oxidizer las the oxid for the period s there suffi abnormal co comments:	Manager and QA may be turned lizer been turned ods of time that cient paper on miditions:	/RA Manager n O I on or off, depend off since the the oxidizer is both recorders	pending on proceed as turned on: is the second of the seco	Date notified:	No above 269 °F?	Yes □ No

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LIQUID SCRUBBER INSPECTION

Scrubber pH; _	. 7	(Should	d be less than 1.0,	if greater than 1.0 a	dd sulfuric acid and	notify Plant Manager
		rmed, Ves				
_	-		_	ing properly?	Yes I.I No ∐N/.	A
•		ns (list alarms ar		*	A	
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		COM	IPLIANCE LE	VEL CHECKS	d .	· · · · · · · · · · · · · · · · · · ·
Flow Rate (70 ± 5 gpm) from Chemrox	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
control panel		4	Inches	Inches	Inches	Markette
	•					
-7α	10e2	100 l	93 Gallons	36 Gallons	105	<u> </u>
:			Canons	Canons .	Gairons	
214			4340	1020	2975	8335
Scrubber rech	arge necessary	(completed rech	arge form to be	attached)	Yes I No	Initials:
.i yes, i iani i	Tanager and QA		XIDIZER INS			initials:
Has the oxid For the perions Is there suffi	izer been turne ds of time that cient paper on	ed off since the t the oxidizer is both recorders	e last daily insp s turned on: is s?: ™Yes □	duction needs. pection? Yes the temperature	above 269 °F? [
10 h		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		• • • • • • • • • • • • • • • • • • • •		
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	And the Control of th)			· · · · · · · · · · · · · · · · · · ·	
nspected by	- Jou	ess.	ري'	Date:	7-27-2	0
lant Manage	r:_ <i>G</i>	· ·	·	Date:	7-28-6	<u> </u>
QA Reviews	Sarah	0-0	2	Date:	7/29/2000)
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Form: F-SC	OPG.9.09.01	-02	Rev. 0	02		Page 1 of 1

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LIQUID SCRUBBER INSPECTION

Scrubber pH:	.7	(Shoul	d be less than 1.0,	if greater than 1.0 a	dd sulfuric acid and	notify Plant Manager
Control panel	lamp test perfo	rmed. 🕮 Yes 🛭] No			
If any bulbs a	re out, replace l	bulbs. Are all a	larm lights work	ing properly? 🖵	Yes □ No □N/	'A
			nd actions taken	,		
					-	
		COM	IPLIANCE LE	YEL CHECKS	g.	
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
gendor parior		2 VV SV RAZSOVIA MISH SSANA	Inches	Inches	Inches	
70	100	راجا	100	23	1 =	7/1
1.0	100		Gallons	Gallons	4 0 5 Gallons	
				,		
	باهليت	-14	4667	652	2975	8294
Scrubber rech	arge necessary	(completed recn	arge form to be	attached) \Box	Yes A-No	
If yes, Plant N	Aanager and QA	/RA Manager n	nust be notified.	Date notified:		Initials:
		9	XIDIZER INS	<u>PECTION</u>	•	
The oxidizer	may be turned	d on or off, de	oending on pro-	duction needs.		
Has the oxid	izer been turne	ed off since the	ast daily insp	ection? 🗆 Yes	□-No	
For the perio	ds of time that	t the oxidizer i	s turned on: is t S? ► ✓ Yes □ I	the temperature	above 269 °F? (Yes □ No
Abnormal co	nditions:	JA	103 🗀			
	25	4	1			
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Comments:	4.				•	*
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mspectod oxig	Long	J. C.		17406;	7-24-22	
Plant Manager	:-Ely			Date:	1-24-6	20
QA Reviews		he i		Date:	במבן רבן ד	Ó
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LIQUID SCRUBBER INSPECTION

, w.		rmed, Wes [oulbs. Are all al		ing properly?	Yes LI No FIN/	A
Control panel			nd actions taken	•	.1 .	
		g commence of the Agraphic materials and company and market				**************************************
		COM	IPLIANCE LE	VEL CHECKS	д.	
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °P)	Storage Temp (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
			Inches	Inches	Inches	
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			Gallons	Gallons	Gallons	
	.1.4		UQ53	29,8	510	8281
orubber rech	arge necessary	completed rech	4853 large form to be	<i>29,8</i> attached) ⊔	Yes No	8281
erubber rech yes, Plant M	arge necessary i	(completed rech /RA Manager r	arge form to be	attached) [] Date notified:	Yes No	
erubber rech yes, Plant M	arge necessary (lanager and QA	I/RA Manager r	large form to be nust be notified.	attached) [] Date notified:	Yes No	100
`yes, Plant M	lanager and QA	A/RA Manager r <u>C</u>	narge form to be nust be notified. DXIDIZER INS	attached) [] Date notified: PECTION	Yes No	
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Tyes, Plant Mark Place P	may be turned izer been turned ds of time that clent paper on additions:	A/RA Manager r d on or off, deped off since the the oxidizer in both recorders	narge form to be nust be notified. OXIDIZER INSCRIPTION OF PROPERTY OF THE PR	attached) [] Date notified: PECTION duction needs. section? [] Yes the temperature	Yes No	Initials:
Tyes, Plant Mark Place P	may be turned izer been turned ds of time that clent paper on additions:	A/RA Manager r d on or off, deped off since the the oxidizer in both recorders	narge form to be nust be notified. OXIDIZER INSCRIPTION OF PROPERTY OF THE PR	attached) [] Date notified: PECTION duction needs. section? [] Yes the temperature	Yes No	Initials:
Tyes, Plant Mark Place P	may be turned izer been turned ds of time that clent paper on additions:	A/RA Manager r d on or off, deped off since the the oxidizer in both recorders	narge form to be nust be notified. OXIDIZER INSCRIPTION OF PROPERTY OF THE PR	attached) [] Date notified: PECTION duction needs. section? [] Yes the temperature	Yes No	Initials:
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The oxidizer las the oxidion the period there suffice. bnormal conformation comments:	may be turned izer been turned ds of time that clent paper on additions:	A/RA Manager r d on or off, deped off since the the oxidizer in both recorders	narge form to be nust be notified. OXIDIZER INSCRIPTION OF PROPERTY OF THE PR	attached) [] Date notified: PECTION duction needs. section? [] Yes the temperature No	Yes No	Initials:

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ant Manager:	Jan Jan	7/1-	\bigcirc	Date:	7-22-20	<u> </u>
spected by:	- laux	9	<u>/</u>	Date:	7-22-20	
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s undic suring	reur hahet off f	oom recorders	Yes 🛛 N 🏲 کوا	he temperature a lo		
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The oxidizer :	may be turned	on or off, der	ending on proc			
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crubber recha	irge nečessary (i	completed rech	araa farm ta ba	nttached) [i	Yes 'I No	Initials:
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			Gallons	Gallons	Gallons	
70	60	00	1 0 U Gallons	21	98	nla
control panel			Inches	Inches	Inches	
(70 ± 5 gpm) from Chemrox	(60-80°F)	(60-75°F)	Level	Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
Flow Rate	Tower Temp.	Storage Temp.	PLIANCE LE Storage Tank	Reactor Tank #1	Downton Town 192	
			·			
					NA	A The Committee of the
Control panel	alarm condition	ns (list alarms a	nd actions taken	for each):		·
	a a cent vabines i					'Α
If any bulbs a	l lamp test perfore	ormed. 🌬 Yes bulbs. Are ail a	⊔ No larm lights work	ing properly? 🎶	Waa Ci Xi Diyi	

LIQUID SCRUBBER INSPECTION

Scrubber pH; _	7	(Should	d be less than 1.0,	if greater than 1.0 a	dd sulfuric acid and	notify Plant Manager
	l lamp test perfo ere out, replace h			ing properly? 🍱	Yes⊓ No. □N/	Δ
	l alarm condition		-		Too In the line	, ,
					•	
·				VEL CHECKS	,I	
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. _(60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
			Inches	Inches	Inches	
70	60	60	79	82	78	MA
			Gallons	Gallons	Gallons	
~\A	r-14	- 51 <i>A</i>	3687	2323	8810	8220
Scrubber rech	iarge necessary (completed rech	arge form to be	attached) \square Date notified:	Yes No	Initials:
1 yes, 1 failt i	nanager and QA		nusi de normeu. DXIDIZER INS			initials:
	r may be turned lizer been turne	d on or off, dep	ending on pro	· · · · · · · · · · · · · · · · · · ·	₩o	
	ods of time that cient paper on			the temperature No	above 269 °F? I	Yes [] No
Abnormal co	onditions:a/	<u>'4</u>	Ŧ			
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Comments:						₹.
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nspected by	Jaure	- C	<u> </u>	PS 4	~~ ~~ ~~	n
,	<u> </u>	5		Date:	7-21-2)>
lant Manage	r	75)	Date:	7/021-0	ΚO
QA Review:	Sara	<u> </u>	Υ	Date:	_1/31/2020)
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Scrubber pH: _	.7_	(Shoul	d be less than 1.0.	if greater than 10 a	dd sulfuric geid ond	l notify Plant Manager)
Control panel	lamp test perfo	ormed. Yes	□ No			
				ing properly? 🗗	Yes □ No □N/	'A
			nd actions taken		l at	
					VI	
			IPLIANCE LE		,d	
Flow Rate	Tower Temp.	Storage Temp.	Storage Tank	Reactor Tank #1	Reactor Tank #2	MOV. (0.200)
(70 ± 5 gpm) from Chemrox control panel	(60-80°F)	(60-75 °F)	Level	Level	Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
			Inches	Inches	Inches	
70	(<i>a a</i>		87		4	
76	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	60	Gallons	4 A Gallons	105 Gallons	n/A
nia	p[4		4060	1190	2975	8225
Scrubber recha	roe necessary (completed rech	once form to be	44 - 1 - 1 - m	**	·
If yes, Plant M	anager and QA	/RA Manager m	nust be notified.	Date notified:		Initials:
			XIDIZER INSI			•
The oxidizer (may be turned	on or off, dep	ending on proc	luction needs.		
ias the oxigi,	act been turne	a on since the	tast dany inspi	ection? Yes	⊡ −No	
or the period	ls of time that	the oxidizer is	turned on: is t	he temperature a	bove 269 °F?	⊢Yes □ No
s mere surre	ient paper on	both recorders	? B→Yes 🗀 N	lo		
Abnormal con	المردــــ:ansi					
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Comments:						May 1
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nspected by	-aun	56	\ .	Date:	7 0 1	
					7-20-20	-
lant Manager:)	Date:	7-21-2	0
A Review	Sarah	<u> </u>		Date:	7/21/2020)
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and the second s	·	**************************************				
orm: F-SO	PG.9.09.01-0	02	Rev. 002			Page 1 of 1

Scrubber pH:_	. 7	(Shoul	d be less than 1.0,	if greater than 1.0 s	ıdd sulfurie aeid and	l notify Plant Manager)
Control panel	lamp test perfo	ormed. 🕪 Yes 🏾	1 No			
Control panel	re out, replace	bulbs. Are all al ns (list alarms a	larm lights work	ing properly?	Yes □ No □N/	'A
					А	
	~- / · · · · · · · · · · · · · · · · · · ·					
		COM	IPLIANCE LE	VEL CHECKS	±	
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp (60-80°F)	Storage Temp (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
SOMEON PARCE			Inches	Inches	Inches	
				<u> </u>		
70	60	60	43	114	22	-10
	,		Gallons	Gallons	Gallons	<u></u>
					_	
Scrubber recha	rge negerary (completed recha	4340	3 2 30	623 Yes II No	8193
f yes, Plant M	anager and QA	/RA Manager m	ust be notified.	Date notified:	11/12	Initials:
			XIDIZER INS		•	
The oxidizer i Has the oxidi:	may be turned zer been turne	on or off, dep	ending on proc	luction needs.		
or the period s there suffic	ls of time that ient paper on	the oxidizer is both recorders	turned on: is t	he temperature a	bove 269 °F? 🗷	Yes □ No
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	alarm condition	ns (list alarms an	id actions taken i	for each):		
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Flow Rate	Tower Temp.	Storage Temp.	Storage Tank	Reactor Tank #1	Reactor Tank #2	MOV (9,200)
(70 ± 5 gpm) from Chemrox	(60-80 °F)	(60-75°F)	Level	Level	Level	Alert Level 8,500 Action Level 8,900
control panel			Inches	Inches	Inches	
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70	60	600	68	116	Gallons	<i>^</i> 14
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Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
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The oxidizer	may be turned	on or off, den	ending on prod	Hetion poods		
las the oxidi:	zer been turne	d off since the	last daily inspe	ection? E Yes	No No	
or the period	s of time that	the oxidizer is	turned on: is the	ie temperature s	ibove 269 ºF? □	Was Ti Ni
	ione bubot out	oom recorders.	Yes N	0		
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Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
			Inches	Inches	Inches	, , , , , , , , , , , , , , , , , , ,
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Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °P)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
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Flow Rate	Tower Temp.	Storage Temp.	Storage Tank	Reactor Tank #1	Reactor Tunk #2	MOV (9,200)
(70 ± 5 gpm) from	(60-80 °F)	(60-75 °F)	Level	Level	Level	Alert Level 8,500 Action Level 8,900
Chemrox control panel						Action Devel 9,500
control paner			Inches	Inches	Inches	
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			Gallons	Gallons	Gallons	A
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Flow Rate (70 ± 5 gpm) from Chemrox	Tower Temp. _(60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
control panel			Inches	Inches	Inches	7
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Flow Rate	Tower Temp,	Storage Temp.	Storage Tank	Reactor Tank #1	Reactor Tank #2	MOV (9,200)
(70 ± 5 gpm) from Chemrox control panel	.(60-80°F)	(60-75 °F)	Level	Level	Level	Alert Level 8,500 Action Level 8,900
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Flow Rate (70 ± 5 gpm) from Chemrox	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
control panel			Inches	Inches	Inches	And Addition of the control of the c
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r		~		VEL CHECKS		
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75°F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
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Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
control paner		The state of the s	Inches	Inches	Inches	
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Control panel If any bulbs a	lamp test perfo re out, replace b	rmed. [4 Yes ] bulbs. Are all a	∣ No larm lights worki	ng properly? יינו		
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Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp (60-75°F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
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he oxidizer as the oxidi	may be turned zer been turne	on or off, de	pending on proc	•	IU No	
or the period	ds of time that	the oxidizer i	s turned on: is t	he temperature	above 240°F? 🗓	-Yes ⊕ No
there suffic	ient paper on	both recorders	s?   Yes   ] N	10		
						** _{**}
bnormal co	onditions:	•	n/d			
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spected by:	- laux	84	<u>/</u>	Date:	3-4+19	
ant Manager:	ERIC	To al	<u>}</u>	Date:	3-4-19	7
A Review;	**************************************	J. Oleb	(	Date:	39-1	9-
7.00	70.0000	2.4	on the second	THE REAL PROPERTY OF THE PROPE		
лт: F-SO	PG.9.09.01-	U2	Revision: 12	<u>/U7/15</u>		Page 1 of 1

# Daily Inspection Compliance Level Ch

Scrubber pH; _	.8	(Should	d be less than 1.0,	if greater than 1.0 a	dd sulfuric acid and	notify Plant Manager)
•		ormed. Wes toulbs. Are all al		ing properly? 🕡	Yes □ No □N/	A
			nd actions taken	•	l s	
		4 *** ****** (40/84			Aleman progression on account assessment as	
	**************************************		· · · · · · · · · · · · · · · · · · ·	TENTA PROFILE		,
	-	COM	IPLIANCE LE	VEL CHECKS		
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank LeVel	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
			Inches	Inches	linches	
69	60	60	102	111	19	0.14
			Gallons	Gallons	Gallons	Fire the second
n)a	nla	nIA	4760	3145	538	8443
Scrubber rech If ves. Plant M	arge necessary (	(completed rech	arge form to be	attached) [] Date notified:	Yes I No	Initiale: 14
, y 50, 1 tunts tv	ranager and Qr				c}#	muais
		ū	XIDIZER INS	PECTION		
			ending on pro last daily insp	duction needs. section? 1 Yes	III No	
or the perio	ds of time that	the oxidizer is	s turned on: is	the temperature	above 240°F? ¿	Yes [] No
s there suffi	cient paper on	both recorders	s? 🗚Yes 🗈 i	No		
						``.
Abnormal c	onditions:	The state of the s	n/A			
(Balta)						
				TO THE RESIDENCE OF THE PERSON	Mark Call And	
nspected by:	Jane	254	.)	Date;	3-5-19	7
lant Manager	ERic	Treat		Date:	7-5-18	3-5-19
A Review:		1 dell	DOSSOWALE .	Date:	35-	<u>'6</u>
		_			•	-
orm: F-SC	PG.9.09.01-	-02	Revision: 12	2/07/15		Page 1 of 1

Scrubber pH:	. %	(Shou	ld be less than 1.0,	if greater than 1.0 a	dd sulfuric acid and	l notify Plant Manage
If any bulbs a		rmed. Ves oulbs. Are all a	∐ No llarm lights work	ing properly?		
Control pane	l alarm condition	ns (list alarms a	ınd actions taken	for each):	1.a	
				77 3-36-46-		
	-	COM	MPLIANCE LE	VEL CHECKS		
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80°F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
The state of the s		-	Inches	Inches	Inches	
68	60	60	73	112	66	<u></u>
			Gallons	Gallons	Gallons	
^ A	×14	n)4	3907	3,73	1870	8450
icrubber rech f yes, Plant N	arge necessary ( Aanager and QA	completed rech /RA Manager r	narge form to be a	attached)	Yes No	Initials:
			OXIDIZER INS		<u>~14</u>	initials. Pla
he oxidizer las the oxid	may be turned izer been turne	on or off, dea	pending on prod		No No	
			•	he temperature a		
			6? WYes T 1		100VC 240 F ( 1 <u>4</u>	168 [] [NO
dicto Surri	cicin paper ou	oom recorder	s: Nerves (; r	NO .	·	****
bnormal c	onditions:	>	۸۱۸			*
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		l			- V	
spected by	- Jame	256c	)	Date;	3.6-10	}
lant Manager	EZIC	uckl	7-7-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	Date:	3-6-19	7
A Review:		all		Date:	3-6-19	<i>)</i> ,
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orm: F-SC	PG.9.09.01-	)2	Revision: 12	/07/15	PER TANDANG PAR CHICAGO	Page 1 of 1

#### LIQUID SCRUBBER INSPECTION

Scrubber pH:_	.8	(Should	l be less than 1.0, i	f greater than 1.0 ac	dd sulfuric acid and	notify Plant Manager)
	l lamp test perfo ure out, replace b			ng properly?	Ýes □ No □N/a	A
			nd actions taken		)	
			ST ALIZANDA			
			IPLIANCE LE			
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80°F)	Storage Temp. (60-75 °F)	Storage Tank Leyel	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
Costa of partor			Inches	Inches	Inches	
69	60	60	85	53	106	^ A
	·		Gallons	Gallons	Gallons	
A / A	n 4	nla		1502	3003	8472
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• •	· ·		XIDIZER INS		A Paris Control of the Control of th	•
		d on or off, dep	ending on pro		i No	
For the period	ods of time that	t the oxidizer i	s turned on: is	the temperature	above 240°F? (i	¥es □ No
Is there suffi	icient paper on	both recorders	s? IVYes 🖂 1	No		
Abnormal o	conditions:			1   1/4	-	9
		<b>\$</b>	<b>.</b>			
Inspected by:	_ James	2, 1Se		Date:	3.7-	19
Plant Manage	er: <u>EZic</u>	weld	<u> </u>	Date;	3-7-	18
QA Review:_	— A	lell	,	Date:	3-7-1	9
	C .					
Form: F-S	OPG.9.09.01	-02	Revision: 12	2/07/15		Page 1 of 1

Revision: <u>12/07/15</u>

#### LIQUID SCRUBBER INSPECTION

lf any bulbs a	lamp test perfo	ulbs. Are all a	I No larm lights work	ing properly?	Yes ti No EN/	
		Tankania . Tankania				
· <del></del>						-75457/- 1 -79744444444444444444444444444444444444
		CON	APLIANCE LE	VEL CHECKS		
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80°F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
Control paner		AND THE PROPERTY OF THE PROPER	Inches	Inches	Inches	
68	Lo	60	104	109	19	10.1.4
			Gallons	Gallons	Gallons	, , , , , , , , , , , , , , , , , , ,
,^\A	n14	~1.4	4853	1	538	8479
			narge form to be must be notified.	attached) [2] Date notified:	Yes WNo .	لم ام الم
		<u>(</u>	OXIDIZER INS	PECTION		
			pending on pro e låst daily inst	duction needs. pection? I Yes	No No	
For the perio	ods of time that	the oxidizer	is turned on: is	the temperature	above 240°F?	Yes □ No
•			s? 11 Yes 11	-		
						14 de .
Abnormal c	conditions:		0\4	that any all the policy and the same and the		
<u> </u>						
	)	١ ميسيد	ì			
nspected by:	- James	3 / Salge	<u>, )                                     </u>	Dntc:	3-8-19	<u>}</u>
Plant Manage	r: Eli	chelo	<u>L</u>	Date:	3-8-19	7
QA Review:_		lel		Date:	3-8-19	
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Revision: <u>12/07/15</u>

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Form: F-SOPG.9.09.01-02

Scrubber pH; _		(Should	be less than 1.0, if	greater than 1.0 ac	dd sulfuric acid and	notify Plant Manager
		rmed. 4 Yes [] oulbs. Are all al		g properly? (i	Yes D No DN/	A
Control panel	alarm condition	ns (list alarms ar	nd actions taken f		d	
			•			
90-	-	COM	PLIANCE LEV			`
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80°F)	Storage Temp. (60-75°F)	Storage Tank Leyel	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
·	PRESERVE AND ASSESSMENT OF THE PRESERVE ASSESSME		Inches	Inches	Inches	
69	60	60	72	112	69	
			Gallons	Gallons	Gallons	
^\A	n14	n14	3360	3,73	1955	8488
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- <b>,, -</b>			XIDIZER INSP		<i>\$\footnote{\pi}</i>	, muuis, <u> w l //</u>
las the oxid	izer been turne	d on or off, dep ed off since the	ending on prod last daily inspe	uction needs. ction? [] Yes	UNo above 240°F? ⊑	⊬Yes ⊡ No
s there suffi	cient paper on	both recorders	? ⊡⊬Yes □ N	o		
Abnormal c	onditions:		1/8			<u> </u>
		THE PARTY OF THE P	······································	1. Keng 14		
	<del></del>	1	1			-
nspected by:_	- Jane	Q [SL	()	Date:	<u> 5-111-1</u>	9
lant Manager	: EB2	- Luci	ch	Date:	3-1/-	19
A Review:	Je	lell	· · · · · · · · · · · · · · · · · · ·	Date:	3-11-1	9
form: E SI	OPG.9.09.01-	02	Revision: 12/	07/1 <i>E</i>		Page 1 of 1

Scrubber pH:	.8	(Shoule	d be less than 1.0, i	if greater than 1.0 ac	ld sulfuric acid and	notify Plant Manager)
	l lamp test perfo ire out, replace l			ing properly?	Ýes (I No IIN/	A
			nd actions taken	n11	man	
	4 - months			·		
		COM	IPLIANCE LE			
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp (60-80°F)	Storage Temp. (60-75 °F)	Storage Tank Leyel	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
control paner	***************************************		Inches	Inches	Inches	
69	60	60	9 b Gallons	3 7 Gallons	105 Gallons	ија
N/A	n   4	~14	4480	1046	2975	8501
			narge form to be a	attached) 🖸	Yes No	Initials:
11 ) 03, 1 111111 1	vianagor and Qr				A.J.F.	
		d on or off, de	OXIDIZER INS pending on pro- e last daily insp		№ No	
For the perio	ods of time tha	t the oxidizer i	s turned on: is	the temperature	above 240°F? i	¥Yes □ No
Is there suffi	icient paper on	both recorder	s? DVYes □ 1	No		
Abnormal o	conditions:		oja .		arina la risson de sisso de s	i.
		1	1			
Inspected by:	>1/m/6	284	2	Date:	3-12-1	9
Plant Mänage	r: Elic	wold		Date:	3-12-	19
QA Review:_		clell_		Date:	3-12-1	9
Form: F-S	OPG.9.09.01	-02	Revision: 12	2/07/15	70 - AREA	Page 1 of 1

Scrubber pH:	,8	(Shoul	d be less than 1.0,	if greater than 1.0 ac	ld sulfuric acid and	notify Plant Manager)
	l lamp test perfo are out, replace b			ing properly? 🎶	Ýes⊡ No ⊡N/	A
·-		•	nd actions taken	,		
and processes and a second sec						
Providency (v. m.) access (v. moremest v. mis		COM	IPLIANCE LE	VEL CHECKS		
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80°F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
- Colling Parity			Inches	Inches	Inches	
68	. 60	60	96	61	& J	n14
			Gallons	Gallons	Gallons	
A1A	~ l 4	v14	4480	1728	2295	8503
Scrubber reci	narge necessary ( Manager and QA	completed rech /RA Manager r	arge form to be a	attached) Li Date notified:	Yes No	Initials:
•			OXIDIZER INS			
		l on or off, de	pending on pro		e No	
For the perio	ods of time that	the oxidizer i	s turned on: is t	the temperature a	above 240°F? 🗷	⊬Yes □ No
Is there suff	icient paper on	both recorders	s? ≌∕Yes ⊔ 1	No		
Abnormal	conditions:	ald				**. *\
1 · · · · · · · · · · · · · · · · · · ·			•			
	7		1			
Inspected by:	( /aux	3 St.	)	Date:	3-13-1	9
Plant Manage	e. Elic V	well		Date:	3-13-1	9
QA Review;_	Jele	$\mathcal{U}_{\underline{}}$	-	Date:	3-13-19	
	W.				·	
Form: F-S	OPG.9.09.01-	-02	Revision: 12	2/07/15		Page 1 of 1

Scrubber pH:	. 8	(Should	l be less than 1.0, i	f greater than 1.0 a	dd sulfuric acid and	notify Plant Manager)
If any bulbs a		ulbs. Are all al	arm lights worki		Ÿes ⊧1 No ŁiN/.	A
•	l alarm condition	•		•	n 1.4	- Marine Valence - Andre de La persona de Valence de Servicion de Serv
						adol-Com France Come and American Services
	-	COM	IPLIANCE LEV	VEL CHECKS		
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80°F)	Storage Temp. (60-75°F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
- Section of the sect	<del> </del>		Inches	Inches	Inches	
69	60	60	& O Gallons	1 1 \ Gallons	58	~10
NIA	n 4	n1A		3145		8521
Scrubber rech	narge necessary ( Manager and QA	completed rech /RA Manager n	arge form to be a nust be notified.	attached)   Date notified:	Yes Wo	Initials:
• /			OXIDIZER INS			
	r may be turnec lizer been turne	l on or off, dep	ending on prod		W No	
For the perio	ods of time that	the oxidizer is	s turned on: is t	he temperature	above 240°F?	Yes □ No
Is there suffi	icient paper on	both recorders	?	ďο		
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Abnormal of	conditions:					À
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		1	:			
Inspected by	- / pu	192515.	6c)	Date:	3-14-1	9
Plant Manage	r: ERic	welc	<u></u>	Date:	3-14-1	9
QA Review:_	1.	dell	······································	Date:	3-14-19	<u> </u>
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Form: F-S	OPG.9.09.01-	-02	Revision: 12	2/07/15		Page 1 of 1

Scrubber pH:	.8	(Shoul	d be less than 1.0,	if greater than 1.0 a	dd sulfuric acid and	notify Plant Manager)
	l lamp test perfo tre out, replace b			ing properly?	Yes ⊞ No ±iN/.	A
			nd actions taken		i	
					d	
	3.000 Manual Constant	COM	IPLIANCE LE	VEL CHECKS	TO THE THE PARTY OF THE PARTY AND A SECURIOR SEC	
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp (60-80 °F)	Storage Temp, (60-75 °F)	Storage Tank Level	Reactor Tank #1	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
Control paner	******		Inches	Inches	Inches	V
68	60	60	108 Gallons	Gallons	102 Gallons	
\A	N//	114	_	595	2890	8585
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			pending on proceed ast daily insp	duction needs. ection? 17 Yes	; 1 <b>1.</b> No	
For the perio	ods of time that	t the oxidizer i	s turned on: is t	the temperature	above 240°F?	Yes [  No
Is there suffi	cient paper on	both recorder	s? IiVYes [] 1	No		
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	7	۱ سیست	1			
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Plant Manage	r: <u>(                                   </u>	1010	Cly-	Date;	3-15-1	9
QA Review:_		Mell	11.	Date:	3-15-19	Manager 77
Form: F-S0	OPG.9.09.01	-02	Revision: 12	2/07/15		Page 1 of 1

Scrubber pH: _	.8	(Should	l be less than 1.0,	if greater than 1.0 ac	ld sulfuric acid and	notify Plant Manager)
	l lamp test perfor are out, replace b			ing properly?	Yes □ No □N/.	A
•		-	nd actions taken	for each):		
				•	اد	
		COM	IPLIANCE LE	VEL CHECKS		
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp (60-75°F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
			Inches	Inches	Inches	
68	ه ص	6 D	96	40	104	~\1
			Gallons	Gallons	Gallons	**************************************
s la	614	014	4480	1133	2947	8560
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For the perio	ods of time that	t the oxidizer i	s turned on: is	the temperature	above 240°F? 5	Yes [] No
Is there suffi	icient paper on	both recorders	s? ₃¥Yes □ ∃	No		
						N _e
Abnormal c	conditions:	***************************************	.1/1			*
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Inspected by S	- James	y y	, (	Date;	3-18-19	?
QA Review:		10.11		Date:	3-18-19	A STATE OF THE STA
ALL ICAICM."		1 color larla		LAUG;	<u> </u>	
	OPG 9 09 01	0.5	Povision: 1			Page 1 of 1

Scrubber pH:	.8	(Should	l be less than 1.0, i	f greater than 1.0 ac	dd sulfuric acid and	notify Plant Manager
		ormed. Wes l bulbs. Are all al		ng properly?	Ýes □ No IJN/	A
Control pane	l alarm conditio	ns (list alarms ar	nd actions taken:	for each):		
		This is 110, 1100 , with think build and the white buryer of the	MANY - MAN, AND		ΙΛ	
		Andrew Comments of the second		The second secon	4	
		COM	IPLIANCE LEV	VEL CHECKS		•
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank#I Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
	APORTONIA (M. 1994)		Inches	Inches	Inches	
69	60	60	97	61	81	۱۵
			Gallons	Gallons	Gallons	
^\4	~ \ 4	n A	4527	1728	2295 Yes □ No 3-19-19	8550
Scrubber rech If yes, Plant N	arge necessary (	(completed rech VRA Manager m	arge form to be a oust be notified.	nttached) www. Date notified:	Yes □ No	Initialsz
ŕ			XIDIZER INSI			for the same of th
Has the oxid	izer been turne	d on or off, deped off since the	ending on proc last daily insp	luction needs.	<b>P</b> No above 240°F? <b>D</b>	Yes □ No
s there suffi	cient paper on	both recorders	? Wes U N	ło		
	•					J. g _{ts}
Abnormal c	onditions:		(COLUMN 1971)	MANAGEMENT ( )		<b>\</b>
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		b	, }		· · · · · · · · · · · · · · · · · · ·	
Inspected by:	Lawe	(S/2)	WCA-64	Date:	3-19-1	q
Plant Manager	(2)C	uelc	2	Date:	3-19-1	9
QA Review:	Je	lell		Date:	3-19-19	
Form: F-S(	DPG.9.09.01	-02	Revision: 12	/07/15	· · · · · · · · · · · · · · · · · · ·	Page 1 of 1

Scrubber pH:	.6	(Shou	ld be less than 1.0,	if greater than 1.0 a	dd sulfuric aeid ane	l notify Plant Manage
Control pane If any bulbs a	l lamp test perfo are out, replace l	rmed. اسبارYes	ll No	ng properly? سنا		ū
Control pane	l alarm condition	ns (list alarms ā	nd actions taken	for each):		
Pro Maria			~ 1 Viv	Tricker - University States	2/4	
<del>2.6</del>	**************************************		APLIANCE LEV			
Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80°F)	Storage Temp, (60-75°F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
			Inches	Inches	Inches	
69	60	60	6°1	103	19	n A
n A	~ A	n]A	Gallons 3220	Gallons  918	Gallons 538	6676
Scrubber rech If yes, Plant N	arge necessary ( lanager and QA	completed rech /RA Manager r	narge form to be a must be notified.	itached) if The Date notified:	Yes No 3-19-19	Initials: ごうく
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				ne temperature a		Nes II No
			s? Ñ✓Yes □ N		.00102101: 2	> 103 (1 NO
	profit puper on	both recorders	5: 10° 10° 11	iu		~
Abnormal c	onditions:	·	1			1
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	)		:	- h dragograph pages	10.000	And the second s
rspected by:	hun	Q 50		Date:	3.20-	19
lant Manager	:_ E12;	CINE	dela	Date:	3-21-1	9
A Review:		Addle		Date;	3-21-19	······································
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'orm: F-SC	PG.9.09.01-	02	Revision: 12/	07/15	· · · · · · · · · · · · · · · · · · ·	Page 1 of 1

Scrubber pH:	ماء	(Shoul	d be less than 1.0,	if greater than 1.0 ac	dd sulfuric acid and	notify Plant Manager)
	l lamp test perfor are out, replace b			ing properly? [d]	Yes ⊟ No ⊟N/	Α
<u> </u>		- AB		n/1	artir value at the	The state of the s
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Flow Rate (70 ± 5 gpm) from Chemrox control panel	Tower Temp. (60-80 °F)	Storage Temp. (60-75 °F)	Storage Tank Level	Reactor Tank #1 Level	Reactor Tank #2 Level	MOV (9,200) Alert Level 8,500 Action Level 8,900
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	r may be turned dizer been turne	on or off, de	pending on pro		CHNO	
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Plant Manage	er: _ <i>&amp;\bar{C}</i>	· weld	<u> </u>	Date:	3-21-17	1
QA Review:		lill_		Date:	3-21-19	The state of the s
	C/					
Form F C	OPG 9 09 01.	_02	Pavision: 1'	2/07/15	· · · · · · · · · · · · · · · · · · ·	Page 1 of 1

#### LIQUID SCRUBBER INSPECTION

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spected by:	huse	252	2	Date:	3-22-1	9
ant Manager:	_ERI	c 620/	<u> </u>	Date:	3-22-1	9
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Inspected by:		MCQ E	266)	Date;	3-25-	19
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Form: F-S	OPG.9.09.01	-02	Revision: 12	<u>//07/15</u>		Page 1 of 1

Scrubber pH:	.6			if greater than 1.0 s	•	d notify Plant Manag
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ant Manager:	EKIC	wel	2h	Date:	3-26-	19
A Review:	J	dell.	•	Date:	3-26-19	
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	l lamp test perfo are out, replace b			ng properly? 🕪	Ýes C. No. DN/	'A
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nspected by:	Zawa	2 Bd	)	Date:	3.27-19	}
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Form: F-SC	OPG.9.09.01-	-02	Revision: 12	2/07/15		Page 1 of 1

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				ng properly? 🕡	Ŷes fî No EIN/.	Α
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- AMENALI.						
form: F-S	OPG.9.09.01	-02	Revision: 12	2/07/15		Page 1 of 1

#### Waldron, Sherry

**From:** ewelch@sterilization-services.com

Sent: Wednesday, September 23, 2020 5:17 PM

To: Waldron, Sherry

Cc:JBoland@Sterilization-Services.com; 'Tammie Brenner'Subject:RE: Records request for submittal by September 23Attachments:Oxidizer calibration.pdf; 3225_001.pdf; 2019_001.pdf

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

#### Sherry,

I apologize for getting this to you so late. I had went on vacation on the 17th and had just read the email this morning. If you need anything else please let me know.

Eric Welch
Plant Manager
Sterilization Services of Georgia
6005 Boat Rock Blvd. SW
Atlanta, GA 30336
office 404-344-8423
fax 404-344-8665
cell 404-973-9645
EWELCH@STERILIZATION-SERVICES.COM

From: Waldron, Sherry < Sherry. Waldron@dnr.ga.gov>

Sent: Thursday, September 17, 2020 3:02 PM

**To:** Eric Welch (SSG) <ewelch@sterilization-services.com> **Subject:** Records request for submittal by September 23

Importance: High

As discussed, the Division is requesting submittal of records prior to an on-site inspection scheduled for your facility. The records are meant to spot-check select records in order to ascertain the facility's compliance with Georgia Air Quality Permit No. 3841-121-0010-S-03-0.

Please submit, both electronically by e-mail to me as well as paper copies to the Division for our files, the following records by <u>Wednesday</u>, <u>September 23, 2020</u>:

- EtO usage for July and August 2020 (P.C.s 7.7, 7.8)
   July (7163.3 lbs.) August (10,729.5 lbs.)
- Weekly scrubber liquor tank liquid level from the months of March 2019 of July 2020 (P.C. 5.4) Attached.
- Records of daily 24-hour average oxidation temperature for the catalytic oxidizer for March 2019 and July 2020 (P.C.s 5.2, 7.3, 7.4, and 7.5) Attached. Same form as daily scrubber tank level.
- Records of the most recent two accuracy verifications for the catalytic oxidizer thermocouple (P.C.
   5.3) Attached

- Documentation that the accuracy of the catalyst temperature monitor is within ±10°F (P.C. 5.2) Same as above.
- Weekly records of the EtO inlet and outlet sampling of the dry bed reactors, and the calculated destruction efficiency (P.C. 5.5), for the time period of June and July 2020. Attached
- The list of spare parts inventory for control equipment (P.C. 4.2). Will send this first thing in the morning.
- What method does the facility use to schedule routine maintenance? Repairs? (P.C.s 4.1,
   4.3) Maintenance is determined by procedures and frequency required.
- Describe how the facility maintains records of startup, shutdown, or malfunction of air pollution control equipment; and periods when continuous monitoring systems or monitoring devices are inoperative, in compliance with P.C. 7.1. Equipment repair procedure and engineering change control procedure.

Thank you for your assistance.

Sincerely,

Sherry Waldron Environmental Engineer Georgia Environmental Protection Division Air Protection Branch 404-362-4569