



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue
Governor


Sheila C. Holman
Director

Dee Freeman
Secretary

October 12, 2010

MEMORANDUM

To: Donald R. van der Vaart, Ph.D., P.E., J.D.

From: Sheila C. Holman 

Subject: Recommendation for Issuance of Air Quality Permit
Stericycle, Inc.
Permit No. 05896T18
Facility ID: 0100010
Haw River, North Carolina
Alamance County

I have reviewed the hearing officer's (Mr. Ronald Slack) report for the public hearings held at the Alamance Community College, 1247 Jimmie Kerr Road, Graham, North Carolina, on Tuesday, May 25, 2010. The purpose of these hearings was to obtain public comment on the draft permit for the renewal of the air quality permit for above referenced facility. I am in general agreement with the hearing officer's recommendation to issue the permit following resolution of my recommendations below:

Hearing Officer Recommendation 1:

The hearing officers report II A. 3., suggested including the packed bed scrubber liquid flow rate as a required monitoring parameter.

Director Decision:

I recommend that the DAQ staff review scrubber monitoring provisions and include in the final permit sufficient monitoring provisions that ensures the proper operation of the scrubber.

Hearing Officer Recommendation 2:

The hearing officers report II A. 4., recommended that the DAQ permitting staff consult with the DAQ Stationary Source Compliance Branch to establish specific permit conditions that meet requirements in 40 CFR 60 Subpart Ec and performance specifications in 40 CFR Part 60, Appendix B., regarding permit requirements for the oxygen and carbon monoxide continuous emission monitors.

Director Decision:

I recommend that the final permit include a requirement for Stericycle to install Continuous Emission Monitors (CEMs) for carbon monoxide. I further recommend the DAQ permit staff consults with the DAQ Technical Services staff to ensure that the final permit includes provisions sufficient to ensure the monitors are properly operated, maintained, and calibrated.

Hearing Officer Recommendation 3:

MACT Subpart ZZZZ establishes national emission limitations and operating limitations for Hazardous Air Pollutant (HAP) emissions from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. The Hearing officer report II A. 5. f., wants the single diesel-fired emergency generator (395 kW) located at the Stericycle facility to be subject to this regulation.

Director Decision

I recommend that the final permit include permit requirements consistent with the RICE MACT.

Hearing Officer Recommendation 4:

Hearing officers report II A. 2., suggests the permit review include calculations estimating what would be the typical annual limits of various pollutants subject to the October 6, 2009 revisions to 40 CFR 60 Subpart Ec, assuming stack air flows were based on flows observed in the latest source tests results.

Director Decision

The permit review document should include emission estimates based on the most recent stack test data.

Hearing Officer Recommendation 5:

Hearing officers report II A. 1., suggested to include a stipulation specifying that the facility meet the requirements of 40 CFR 60 Subpart Ec by October 6, 2014 or **earlier**.

Director Decision

This specific issue is before the NC Environmental Management Commission (EMC), and a vote on the rule is expected at the November 18, 2010 EMC meeting. I recommend that the permit indicate the final compliance date for the requirements of 40 DFR 60 Subpart Ec shall be no later than the date set forth in the final EMC action on this rule.

Hearing Officer Recommendation 6:

Hearing officers report II A. 1. a, through d, suggests various changes to the permit.

Director Decision

I recommend the review engineer should make the necessary changes in consultation with his supervisor and record the reasons for the changes in his review.