

Siemens Water Technologies Corp., Hydrocarbon Recovery Group  
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October 30, 2006

Lalit Sharma, P.E.  
Division of Environmental Quality  
Transportation and Environmental Services City of Alexandria  
301 King Street  
City Hall, Room 3900  
Alexandria, Va. 22314

Dear Mr. Sharma,

During our meeting of October 18, 2006 we discussed your concerns regarding off-site nuisance odors potentially originating from our Alexandria processing facility. In response to this concern, we are proposing the following actions to address each specific area where we have identified the potential for nuisance odor:

#### **Recycled Fuel Oil (RFO) Loading**

The facility loads heated RFO into transport tankers, predominantly in the morning, and continuing through the day. This oil has a flash point over 140F by regulation and has a very low vapor pressure. Though vapor recovery is not generally practiced for heavy fuels, we are going to extend our existing vapory recovery system to include this operation, precluding the tanker vapor space from being discharged into the atmosphere. This should be complete by December 31, 2006.

#### **RFO Storage Tanks**

Tanks 10 and 11 are designated for the storage of heated RFO. In order to eliminate the possibility of vapors escaping these tanks, pressure loaded vapor conservation valves, as are typically installed on large gasoline storage tanks, were installed on the tanks in August 2006.

#### **Vibrating Screen Area**

As a part of the recycling process the used oil is filtered through a vibrating screen with a 100 mesh filter. This unit functions much like a large flour sifter, and because it is an older design, is not air-tight. We will be replacing the required parts to upgrade this unit to the most recent air-tight design. This unit is connected to the existing vapor recovery system, but leaks in the current cover assembly have the potential to reduce the control efficiency. The required parts have been ordered and installation should be complete by January 31, 2007.

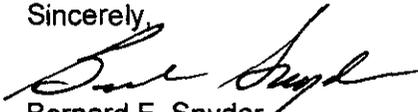
**Biofilter Area**

In cooperation with the Alexandria health department we have tested the biofilter over time, maintaining the compost over time as needed. It has been shown to be over 90% effective in removing VOC's from the influent air. To further increase the efficiency of the unit we are currently engineering a safe, effective system that will be equivalent to the following: An effective cover, potentially consisting of an air-tight metal building similar to a bag house. Air will be drawn from this structure with a blower through a carbon bed, effectively eliminating any question that odors are originating from this source. This project should be complete by February 28, 2007.

**Inspection of Equipment**

Our existing Equipment Integrity Testing Program required under the EPA SPCC regulations will be expanded to include maintenance inspections of the above systems when they are complete. This program includes periodic inspection of piping, tanks, and relief valves as described in API 653.

Sincerely,



Bernard F. Snyder  
Branch Manager