

*Attachment F*

BEFORE THE ENVIRONMENTAL APPEALS BOARD  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.

IN THE MATTER OF	)	RCRA Appeal _____
VICKERY ENVIRONMENTAL, INC.-	)	
	)	AFFIDAVIT OF MOHAMMED ALI IN
	)	SUPPORT OF VICKERY
VICKERY ENVIRONMENTAL, INC.	)	ENVIRONMENTAL, INC.'S PETITION
	)	FOR REVIEW
RCRA Permit no. OHD 020 273 819	)	

STATE OF OHIO     )  
                                  ) ss:  
County of Sandusky )

I, Mohammed Ali, being first duly sworn, depose and say:

1. I have personal knowledge of the facts contained in this affidavit.
2. I have a Master of Science in Civil/Environmental Engineering from Ohio University. I am a Professional Engineer (P.E.) currently licensed by the State of Ohio.
3. I have been employed by: American Landfill, Inc., from January 10, 2000 through March 8, 2009; Waste Management of Ohio, Inc., from March 8, 2009 through December 23, 2012; and Waste Management of Michigan, Inc. from December 23, 2012 to the present. Waste Management of Ohio, Inc. is the parent company of Vickery Environmental, Inc. ("VEI"). My current position is Engineering Manager and my duties for Waste Management of Michigan, Inc., include: permitting, compliance, construction management, project management, planning, budgeting for capital projects, environmental reviews, facility inspection and coordination with consultant and contractors.

4. On October 3, 2019, I performed an inspection of the operations and equipment of the VEI facility located at 3956 State Route 412, Vickery, Ohio 43464 (“Facility”).

5. I have reviewed the waste storage and treatment tank system at the Facility, which consists of six tanks, a total of two 100,000 gallon tanks and a total of four 200,000 gallon tanks (T-1, T-2, T-5, T-6, T-9, and T-10) (“T-Tanks”).

6. I have reviewed Attachment 1- T-Tank Diagram and can attest that it is an accurate representation of the T-Tanks, the manifold system, the pressure-vacuum relief valve conservation vents and acid vapor scrubber system.

7. Each of the T-Tanks are equipped with a fixed roof and there are no visible cracks, holes, gaps, or other open spaces between roof section joints or between the interface of the roof edge and the tank wall.

8. Each of the T-Tanks is equipped with closure devices and there are no visible cracks, holes, gaps, or other open spaces in the closure devices or between the perimeter of the opening and the closure devices.

9. Each of the T-Tanks are equipped with Level 1 pressure-vacuum relief valve conservation vent that vents to atmosphere (See Attachment 1- T-Tank Diagram- Conservation Vents identified as Numbers 1 -6). Conservation Vents Numbers 1-6 ensure protection of the integrity of the physical tank.

10. Each T-Tank is connected to a head gas manifold system in a single line that eventually leads to an acid vapor scrubber system. A Level 1 pressure-vacuum relief valve conservation vent is connected to the manifold system that vents to atmosphere through the site acid vapor scrubber system (See Attachment 1 – T-Tank Diagram- Vent identified as Number 7).

The manifold system reduces the total tank farm emissions by allowing vapors from tanks being filled to move to tanks that are being emptied which is referred to as a vapor balance system. By design of the manifold system, gases in the T-Tanks only vent to atmosphere when the pressure-vacuum relief valve conservation vent- Vent Number 7- is activated at which time gases are vented through the acid vapor scrubber. During normal operations, the only time Vent Number 7 is activated is when waste is being unloaded from trucks at a rate greater than the rate waste is being removed from the tank system. The manifold system results in less volatile organic compound emissions to the atmosphere than if there was no vapor balance system and each T-Tank directly vented to the atmosphere through its individual conservation vent (Vents 1-6).

11. The facility acid vapor scrubber is designed to remove acid vapors from tank head space by contact with alkaline water. It is a counter-flow contact scrubber. The scrubbing agent is water with a pH ranging from 8 to 12. The scrubbing agent is used for removal of acid vapors, not for removal of organic vapors.

DATED this 3<sup>rd</sup> day of October, 2019.



Mohammed Ali, P.E.

SUBSCRIBED AND SWORN to before me this 3<sup>rd</sup> day of October 2019, in Vickery, Ohio.



NOTARY PUBLIC for the State of Ohio

My Commission Expires: 3/28/21



**BRETT A. MILLER**  
Notary Public, State of Ohio  
My Commission Expires 3/28/21

Attachment 1: T-Tank Diagram

