

Bajwa, Mehak

From: Bajwa, Mehak
Sent: February 10, 2025 1:50 PM
To: Dave Howes
Cc: Dey, Asit; Edossa, Desalegn; Rathamano, Raj
Subject: RE: File No. 3440.20_ Miller Environmental Inc.- Solvent Recovery NoA

Good afternoon Dave,

- Contents of tanks (materials/waste stored), capacity/volume, and purpose of use.
- If the contaminated solvent is transferred to totes, provide the procedures and tank involved in transferring.
- Identify all potential VOC emission points and processes and indicate the process by which these emissions are collected and treated.
- Operating hours, solvent recovery unit capacity, volume of contaminated solvent recovered per day/month/year.
- What happens to the clean solvent collected in drums? Explain the process.
- Explain the process for handling heated drums.
- What happens to the still bottom drums? What is the anticipated quality, quantity, and location of the still bottom generated per day/month/year? How are these still bottom waste treated/disposed of? What is the destination facility?
- Provide a copy of the Emergency Response Plan outlining the steps in solvent recycling process related emergencies. It should include the receipt of contaminated solvents, handling, unloading and transferring, solvent recycling, clean solvent storage, still bottom handling and storage, transfer, and shipment.
- Provide the list of solvents to be processed based on their categories of different solvent classes such as acid, alcohol, alkene, ester, hydrocarbon, amine, and aromatics.
- Explain in detail the process feed testing protocol. How is the thermal instability of the process feed identified?
- Indicate if the Nitrocellulose Package is included in the solvent recycling system.
- What are the temperature and pressure requirements of the machine and how will these conditions vary with different liquids?
- What are the leak detection mechanisms used - for liquid and vapour?
- What are the checks in place to confirm the solvents are cleaned?
- What processes are entailed in the cleaning and maintenance of the system?
- The safety devices will stop the unit in case one of the sensors detects a specific condition- what are these conditions? What are the safety mechanisms?
- What is the efficacy of the process?
- Verify that explosion-proof equipment, proper ventilation, and fire suppression systems are designed for hazardous solvents.
- Will all the existing blending processes get converted to this recycling process? What impact will the system have on throughput or production capacity?

I will be sending you the meeting invite shortly.

Thank you.

Thank you.