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03/24/2008 03:48 PM

To Genevieve Damico/R5/USEPA/US@EPA  
cc Nancy.Paddock@veoliaes.com,  
David.Klarich@veoliaes.com  
bcc

Subject Re: Additional Information Requested from March 19  
Conference Call

Genevieve,

Attached is additional information on the Title V Permit as discussed during our March 19 conference call. Please call if you have any questions about this information.

(See attached file: March 19 requested info for G. Damico.doc) (See attached file: State Permit.pdf)

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March 19 requested info for G. Damico.doc State Permit.pdf



## Hazardous Waste Combustors Emissions Limitations

Section 2.1(A) 7 (c) reads:

(c) Emissions to the atmosphere from sludge incineration plants that process wastewater treatment plant sludges shall not exceed 3.2 kg of (7.1 lb) mercury per 24-hour period.

Veolia has reviewed the applicability section and has determined that the facility does not meet the applicability requirements defined in 61.30 (a) and (b). Veolia references 40 FR 48298, October 14, 1975. This document and the corresponding reference Background Information on Development of National Emission Standards for Hazardous Air Pollutants: Arsenic, Beryllium and Mercury (March 1973) are used as support for Veolia's position of non-applicability. The October 1975 Federal Register document indicates that this regulation does not apply to solid waste incinerators; as a result, Veolia has determined that the incinerators are not subject to the Mercury NESHAP.

Section 2.1 (C)(1)

(1) The permittee shall not burn beryllium containing waste, hospital medical infectious waste and municipal waste.

Veolia has the ability to accept hospital medical infectious waste under an Illinois EPA State Permit #2000-334-SUP that addresses solid waste management activities. This permit has no expiration. Special Condition #29 of this permit defines the condition associate with the Illinois Potentially infectious Medical Waste (PIMW) regulations. Under this condition, the facility is allowed to accept PIMW and must comply with these regulations. A copy of the permit is attached.

Section 2.1(D)(4)(o)(i)

This section is directly out of the Permanent Replacement Standards, 40 CFR 1209(m)(1)(iv) that define the requirements for other particulate control devices. This section does not apply to fabric filters. 1209(m)(1)(iv) specifically excludes fabric filters of which Veolia operates at this facility. There are no operating parameters defined in the Permanent Replacement Standards for fabric filters, however, Veolia does have high and low pressure drop limits on the fabric filter system.

Storage Tanks:

As a waste minimization effort, Veolia would like to retain functional carbon canisters as long as possible. After reviewing historical breakthrough data for carbon on storage tanks, a lengthened timeframe before disposal of carbon canisters on low BTU tanks is being requested.

Section 2.4(D) 4 as it reads in the Draft:

If a breakthrough does not occur within 365 days of operation, the carbon shall be replaced.

Suggested change:

If a breakthrough does not occur within 365 days of operation on a high BTU tank, the carbon shall be replaced. If a breakthrough does not occur within 3 years of operation on a low BTU tank, the carbon shall be replaced.

Bulk Pits:

Section 2.5 (D) 6 as it reads in the Draft:

The Permittee shall continuously maintain and monitor the negative pressure inside the building, such that it is maintained at -0.7" w.c. at all times. [40 CFR §71.6(a)(3)(i)(B)]

Suggested change:

The Permittee shall maintain an average facial velocity of at least 200 ft/min flowing into the enclosure at all natural draft openings in the building. The Permittee shall annually demonstrate the facial velocity according to Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure, 40 CFR 52.741, Appendix B.

Gasoline Storage Tanks

Section 2.6 (D) itemizes Monitoring and Testing requirements for the gasoline storage tank. Among the items required are gasoline sampling and analysis by Reid vapor pressure, and determination of ethanol content if applicable. Veolia would like the option to reference a letter from the supplier certifying compliance with these requirements.

Section 2.6 (E) itemizes Recordkeeping and Reporting requirements for the gasoline storage tank. There is a requirement that Veolia report details of the sampling and analysis on the gasoline. Veolia would like the reporting requirements on testing and analysis removed from this section.

Veolia would like Gasoline Storage Tank requirements for the Sauget, IL facility to reflect those of Olin, IEPA ID # 119020AAG, which have been inserted below. Olin is located in Madison County and is subject to the same Metro East VOM requirements for gasoline storage tanks as Veolia.

Olin's permit reads:

#### 7.6.3 Applicable Provisions and Regulations

- a. The "affected storage tank", for the purpose of the unit specific conditions in Section 7.6 is an emission unit described in conditions 7.6.1 and 7.6.2.
- b. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 liter (250 gallon), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 219.122(b)]. Except as provided in the following exemptions: If the tank is a pressure tank then the limitations of 35 IAC 219.122(b) shall not apply [35 IAC 219.121(a)] or if no odor nuisance exists then the limitation of 35 IAC 219.122(b) shall only apply when the tank is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F [35 IAC 219.122(c)].
- c. No person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary tank at gasoline dispensing operation, unless such tank is equipped with a submerged loading pipe [35 IAC 219.583(a)(1)].

7.6.4 NOTE: Non-applicability section removed.

#### 7.6.5 Control Requirements and Work Practices

Each affected storage tank (as defined by Condition 7.6.3(a)) is subject to the applicable provisions of Condition 7.6.3. The affected storage tank (as defined by Condition 7.6.3(a)) shall be equipped and operated with a submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA, pursuant to 35 IAC 219.122(b) and/or 219.583(a). The Illinois EPA has not approved use of other equivalent equipment in lieu of a submerged loading pipe or submerged loading fill.

#### 7.6.6 Production and Emission Limitations

Production and emission limitations are not set for the affected storage tanks (as defined by Condition 7.6.3(a)). However, there are source-wide production and emission limitations set forth in Condition 5.6.

#### 7.6.7 Testing Requirements

Testing requirements are not set for the affected storage tanks (as defined by Condition 7.6.3(a)). However, there are sourcewide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

#### 7.6.8 Monitoring Requirements

Monitoring requirements are not set for the affected storage tanks (as defined by Condition 7.6.3(a)). However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

#### 7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected storage tanks (as defined by Condition 7.6.3(a)) to 118

demonstrate compliance with Conditions 5.6.1, 7.6.5 and 7.6.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Design information for the tank showing the presence of a submerged loading pipe or submerged fill;
- b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;
- c. The throughput of the affected storage tanks (as defined by Condition 7.6.3(a)), gal/yr; and
- d. The annual VOM emissions from the affected storage tanks (as defined by Condition 7.6.3(a)) based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

#### 7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected storage tanks (as defined by Condition 7.6.3(a)) with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Operation of the affected storage tanks (as defined by Condition 7.6.3(a)) in excess of the limits specified in Conditions 7.6.3 and 7.6.5 within 30 days of such occurrence.

#### Boiler:

Veolia operates one small gaseous fuel, firetube boiler. A second boiler of the same type is proposed to be installed. Veolia is subject to 40 CFR 61 Dc, however there are no standards in this Subpart for strictly natural gas fired boilers. Veolia was subject to 40 CFR 63 DDDDD prior to this Subpart being vacated in 2007. While Veolia's boiler was technically subject to Subpart DDDDD, due to the fact that the boiler is a firetube boiler that burns strictly natural gas, Veolia was not subject to the initial notification requirement, any general provisions in Subpart A of Part 63, emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping nor reporting requirements of Subpart DDDDD.

As the boiler is fired with natural gas, emissions are easily calculated with published emission factors. In addition, the annual process rate is very low, which supports Veolia's belief that maintaining documentation of fuel usage should be the only requirement for this boiler in the Title V permit.

It is worth noting that Olin's permit (the same one referenced in the Gasoline Storage Tank comments) covers six boilers which are 3 times the size of Veolia's single boiler. Olin's permit has no requirement for any of the following:

- Method 9 opacity testing,

- annual CO performance testing,
- stack testing for O<sub>2</sub> and CO<sub>2</sub>
- Method 4 moisture content testing of stack gases





## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

November 28, 2000

CERTIFIED MAIL

7099 3400 0001 2108 5818

Trade Waste Incineration  
Division of AETS, L.L.C.  
#7 Mobile Avenue  
Sauget, Illinois 62201-1069

Re: 1631210009 -- St. Clair County  
Trade Waste Incineration Inc.  
Permit No. 2000-334-SUP  
Log Number: 2000-334, 1999-206, 1996-113, 1984-661, 1984-745, 1984-784, 1984-779  
(1984-640), 1985-111, 1986-127 (1986-055), 1986-137, 1986-137A, 1986-185, 1986-224,  
1986-225, 1987-112, 1987-141, 1987-283, 1987-207, 1987-277, 1987-285, 1988-279  
Permit File

Gentlemen:

Supplemental permit is hereby granted to Trade Waste Incineration, a Division of Chemical Waste Management, Inc., to transfer operation and ownership of a solid waste management site to Trade Waste Incineration, a Division of AETS, L.L.C. The permit authorizes the operator to store special waste in drums and tanks, and incinerate special waste; said site generally described as 33.795 acres in Township 2 North, Range 10 West, Third Principle Meridian, all in accordance with the application and plans referenced above. This permit is generally intended to regulate the management of non-hazardous waste except as noted otherwise. The RCRA Part B permit is intended to regulate hazardous waste activities.

This permit also includes the following modifications to the original Development and Operating Permit Nos. 1983-10-DE and 1983-10-OP:

- a. The operation of a mobile double shear shredder in accordance with the application and plans referenced under Log No. 2000-334.

This permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions:

1. This facility shall be developed and operated in accordance with 35 Ill. Adm. Code, Subtitle G. In the event that the development or operating plan submitted with the application differs from the terms and conditions of this permit, the terms and conditions of this permit shall apply.

GEORGE H. RYAN, GOVERNOR

2. Any modifications to the facility, or types or classes of wastes shall be the subject of an application for supplemental permit for site modification submitted to the Illinois EPA.
3. The owner or operator must keep a written operating record at the facility. The following information must be recorded as it becomes available and maintained in the operating record until closure of the facility.
  - a. A description and the quantity of each special waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility;
  - b. The location of each special waste within the facility, and the quantity at each location;
  - c. Records and results of waste analysis and trial tests;
  - d. Summary reports and details of all incidents that require implementation of the contingency plan; and
  - e. Records and results of inspections (inspection records and results need be kept only three years).
4. All incoming special wastes must be accompanied by a manifest. For wastes that are going to be incinerated, the following authorization numbers shall be used for the waste indicated below:
  - . 090001 - Hazardous Waste
  - . 090002 - Non-Hazardous Special Waste
  - . 090003 - Potentially Infectious Medical Waste
5. All loading/unloading of special wastes shall be accomplished over spill containment devices.
6. Wastes that are transferred into drums at the facility shall only be transferred into new drums or empty drums that previously held a compatible waste.
7. The discharge of any potentially contaminated storm water run-off, hazardous waste spills or process wasters other than venturi scrubber wastewater into the Village of Sauget STP shall be in compliance with 35 Ill. Adm. Code: Subtitle C.
8. All incoming wastes shall be analyzed in accordance with the Waste Analysis Plan submitted with the application. Records and results of these analyses shall be kept in the operating record.

9. Special wastes generated at the site and disposed or further treated elsewhere shall be transported to the receiving facility utilizing the Illinois EPA's supplemental permit and manifest system.
10. Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a developmental and operating permit for this site. Permittee shall notify the Illinois EPA of any changes in the names or addresses of both beneficial and legal titleholders to the herein-permitted site. Such notification shall be made in writing within fifteen (15) days of such change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
11. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.
12. The Illinois EPA reserves the right to require installation of additional monitoring devices, to alter the selection of parameters to be analyzed and to alter monitoring frequencies as may be necessary to fulfill the intent of the Environmental Protection Act.
13. Nothing in this permit shall be construed as relieving the permittee of the responsibility of complying with other local, state or federal rules or regulations regarding this facility.
14. The permittee shall comply with Ill. Rev. Stat., 1980, Sec. 1022.2(b), as amended from time to time, and with the procedures adopted by the Illinois EPA in furtherance of such statutory provision and as set forth in a document entitled "Procedures for Operation of a Hazardous Waste Disposal Fee System", as published in 4 Illinois Register 774 (September 12, 1980).
15. Final plans, specifications, applications and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency, Division of Land Pollution Control, by the permit number(s) and log number(s) designated in the heading above.
16. RCRA empty containers as defined in 35 Ill. Adm. Code 721.107(b) that have not been triple rinsed and are being sent for disposal must be shipped under manifest to a special waste landfill.
17. RCRA empty containers that have been triple rinsed in a manner which removes all visible residue are not special wastes and may be disposed at a permitted municipal landfill without a manifest. All residues generated from the cleaning of the RCRA empty containers are considered special wastes.
18. Potentially Infectious Medical Waste shall be incinerated immediately upon receipt or as soon as possible within 10 days.

19. The transfer of wastes to the SCA incinerator shall be in accordance with the application referenced above and the following procedures:
  - . Receive wastes in steel drums and/or tank trucks;
  - . Handle the waste in accordance with the existing operating permit at TWI (i.e., decant and blend operations);
  - . Repackage wastes into containers and/or tank truck loads which meet the requirements of the SCA incinerator operating permit; and
  - . Transfer the repackaged wastes to the SCA incinerator (0316000058).
20. All shipments of waste of the SCA incinerator (0316000058) shall list TWI as the generator.
21. For all wastes shipped to the SCA incinerator, the following authorization numbers shall be used for the wastes indicated below:
  - . 090004 - Hazardous Waste
  - . 090005 - Non-Hazardous Special Waste
22. All hazardous wastes shall be managed in accordance with the facility's RCRA Part B permit; effective date May 5, 1988.

Special Conditions for the storage of non-hazardous waste in containers in the ash storage buildings.

23. Containers shall be arranged in a manner which allows for the inspection of individual containers.
24. Fifty-five (55) gallon containers shall not be stacked more than two containers high. Smaller containers shall not be stacked higher than the equivalent height of two 55-gallon containers.
25. A minimum of four feet (4') of aisle space shall be maintained between rows of containers.
26. Containers of non-hazardous special waste shall only be stored in ash storage buildings #2 or #3.
27. Incompatible wastes shall not be stored in the same building.
28. Inspection of the non-hazardous drum storage areas shall be carried out in accordance with the schedule contained in the application. Records of all inspections shall be kept in the operating record.
29. This facility shall be operated in accordance with the new Potentially Infectious Medical Waste legislation (Section 3.81 and Title XV of the Act). This legislation mandates the Illinois Pollution Control Board to adopt regulations specific to PIMW by January 1, 1993.

This facility will be subject to the new PIMW regulations upon the effective date of those regulations. In addition, the facility shall submit to the Illinois EPA a supplemental permit application (LPC-PA1) within 60 days of the effective date of the new regulations for all modifications required as a result of these new regulations.

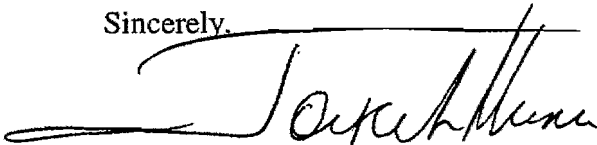
Special Conditions for the operation of mobile double shear shredder.

30. Reactive and/or ignitable wastes are not permitted to be shredded.
31. Only non-hazardous waste shall be processed through the shredder.
32. An operating permit from the Illinois EPA's Bureau of Air may be required to operate this unit.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Within 35 days after the notification of a final permit decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Sincerely,



Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

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Attachment

cc: Barbra Hohl, St. Clair County Health Department

