

# Plan EJ 2014 Implementation at Region V

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“Enhance the ability of overburdened communities to participate fully and meaningfully in the permitting process for **EPA-issued** permits and take steps to meaningfully address environmental justice issues in the permitting process for **EPA-issued** permits to the greatest extent possible”



# Enhanced Public Participation for EPA issued Permits

- Identify interested parties
- Fact Sheets
- Longer comment period
- Public Hearing

**Air Permit Renewal Planned for Hazardous Waste Incinerator**  
Oct. 2014  
Veolia ES Technical Solutions Air Permit  
Saugel, Illinois

The U.S. Environmental Protection Agency plans to reissue a Clean Air Act operating permit for Veolia ES Technical Solutions LLC. The permit is for a facility at Mobile Ave. in Saugel, Illinois that stores and burns hazardous waste. EPA is accepting public comments on the renewal (see box, left).

In addition to emissions limits, work practice requirements, and monitoring and recordkeeping requirements found in Veolia's current permit, the renewed permit would incorporate some changes, including:

- Limits on how much arsenic, lead, mercury and other metals Veolia can put into its incinerators - called the "feedrate limits" or "OPLs" - based on results of Veolia's performance tests in October 2013
- Enhanced waste analysis procedures to ensure compliance with applicable national feedrate limits.
- Temporary (12 months) installation and operation of a special emissions monitoring system on each incinerator to ensure the feedrate limits are adequate to assure compliance with applicable emissions limits.
- New requirements for emergency generators.

Veolia will continue operating under its current permit until EPA either reissues the permit or denies the company's application.

**Background**  
The Clean Air Act requires an operating permit - known as a Title V permit - for facilities that emit or have the capacity to emit large amounts of air pollutants and for certain types of facilities that emit smaller, but specific federal standards. Veolia is required to get a Title V permit because it is subject to federal standards for incinerators and because it has the capacity to emit large amounts of pollution. This permit deals the amount of pollution the facility can emit and what it must do to control its five-year increments.

EPA issued Veolia's initial permit Sept. 12, 2008. In January 2011, EPA began a process to reissue the 2008 permit, and later chose to simply incorporate the proposed changes into Veolia's permit renewal.

**Pollutants affected by the permit**  
Veolia's Saugel facility emits a variety of pollutants regulated by EPA, including:

- Carbon monoxide
- Nitrogen oxides
- Sulfur dioxide
- Fine particles, known as particulate matter
- Volatile organic compounds
- Mercury
- Semi-volatile metals such as cadmium and lead
- Low-volatile metals such as arsenic, beryllium and chromium
- Dioxins and furans
- Hydrogen chloride

**Public hearing scheduled**  
EPA will hold a public hearing from 3 to 7 p.m. Wednesday, Dec. 3, at:

517 Edwardsville  
East St. Louis High School  
Campus  
2002 Building D  
601 James F. Thompson Blvd  
601 James F. Thompson Blvd

If you need special accommodations to attend the hearing, contact Andrew Morgan at [morgan.andrew@epa.gov](mailto:morgan.andrew@epa.gov) by Friday, Nov. 21.

**How to comment**  
You will have an opportunity to make oral comments at the public hearing. You may also send EPA written comments on Veolia's permit renewal until Friday, Dec. 19. There are several ways to comment (see Page 4 for details).

**For more information**  
You may review the draft permit and a document called a "Statement of Basis," which details reasons for the permit changes. Visit one of the sites below:

- Central Library, 1301 Olive St., St. Louis
- East St. Louis Library, 3300 State St., East St. Louis
- Cahokia Public Library, 140 Cahokia Park Drive, East St. Louis

**Facility tours available**  
Veolia is offering tours of its Saugel facility. To arrange a tour, contact Doug Harro, 618-271-2804.

**Combustion process**  
The combustion processes of Units 3 and 4 are highly different. As follows (similar to Unit 1):

Each combustor has a primary and secondary combustion chamber that includes natural gas-fired auxiliary burners used during startup, shutdown, and malfunctions, and for additional heat input. The combustors are also connected to spray dryer absorbers and baghouses, which help control air pollution.

Combustor #4 also has a tempering chamber and activated carbon injection to further help control air pollution. Veolia is required to monitor continuously for carbon monoxide and hydrogen chloride emissions.

The combustors are augmented by a lime handling system and an ash handling system. The lime handling system feeds lime to the spray dryer absorber, an important control in this air pollution control technology. The ash handling system ensures that ash produced during the combustion process is collected and properly disposed of.

**Changes to the permit**  
A Title V permit is an enforceable compilation of all operating terms, conditions and limitations that apply to an emission source. It is meant to improve compliance



# What the facility can do

- Engage “early and often”
- Best practices for effective public participation
- Involvement in development of public participation plan
- Hotline or facility contact for community members



# Making a Visible Difference in Communities





# Citizen Trainings

- Permitting and rulemaking
- Industry specific trainings
- Coordination with state and local agencies

