VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
Petition for Review to the Environmental Appeals Board of the United States Environmental Protection Agency, Washington, D.C.

Exhibit 2

Comparative Mercury Emissions for Sources Within 50 Miles of Sauget, Illinois

Note: The first chart includes TRI data from reporting year 2013 and was included in Veolia's comments at VES 019543. The second chart updates the emissions information using data from TRI reporting years 2014 and 2015. The second chart has been Bates labeled consistent with Veolia's comments for ease of reference.

D. Region 5 is Unreasonably and Unfairly Requiring Veolia to Install Multi-Metals CEMS.

1. *Veolia Is a Small Source of Mercury Emissions In the St. Louis Area*

As evidenced by the permitting and enforcement history set forth above, Region 5 s primary concern since this process began has been Veolia s mercury emissions.[22] However, Veolia s yearly mercury emissions are magnitudes lower than other major sources of mercury emissions in the St. Louis area. As the table below shows, Veolia s estimated Toxic Release Inventory ("TRI") emissions for reporting year 2013 were a mere 3.1 pounds of mercury. *See* Veolia 2013 Form R at VES 019265-019270.

Facility	State	TRI Mercury Emissions for 2013 Reporting Year*	Method of Calculation	Approx. Distance & Direction from Veolia s Sauget Facility
Labadie Power Station	MO	823.2 lbs/yr	published emission factor	36.6 miles west
Rush Island Power Station	MO	402.5 lbs/yr	published emission factor	32.6 miles south
US Steel - Granite City	IL	223.41 lbs/yr	published emission factor	7.5 miles north
Sioux Power Plant	MO	194.9 lbs/yr	published emission factor	19.3 miles southwest
Baldwin Power Station	IL	82.7 lbs/yr	site-specific emission factor	32.6 miles southeast
Meramec Power Plant	MO	68.7 lbs/yr	published emissions factor	15.9 miles southwest
Mississippi Lime Concrete Plant	MO	54.16 lbs/yr	published emissions factor	45.0 miles south
Wood River Power Station	IL	41.3 lbs/yr	site-specific emission factor	18.4 miles north
Prairie State Energy Campus	IL	40.0 lbs/yr	site-specific emission factor	35.9 miles southeast
Wood River Refinery	IL	20.0 lbs/yr	published emissions factor	17.7 miles north
Veolia Incinerator	IL	3.1 lbs/yr	site-specific emissions monitoring	0 miles

*Values are from each facility s 2013 reporting year Form R, *at* www.epa.gov/enivro/facts/triform_r_search.html.

[22] This is evidenced by the fact that Region 5 s 2013 reopening proposal included greater feedrate limits (i.e., more lenient limits) for LVMs and SVMs than those limits Veolia had established through performance testing. *See* Region 5 proposed Title V permit VES 000002-000135 (Jan. 2013).

Comparison of St. Louis Area Mercury Emissions: 2013-2015 TRI Reporting Years

Facility	State	TRI Mercury Emissions for 2013-2015 Reporting Years* (lbs/yr)			3 yr. avg.	Method of Calculation	Approx. Distance & Direction from Veolia's Sauget Facility
		2013	2014	2015			
Labadie Power Station	MO	823.2	400.10	480.80	568.03	published emission factor	36.6 miles west
Rush Island Power Station	MO	402.5	301.20	58.30	254.00	published emission factor	32.6 miles south
US Steel - Granite City	IL	223.41	2.84	110.57	112.27	published emission factor	7.5 miles north
Sioux Power Plant	MO	194.9	147.80	24.00	122.23	published emission factor	19.3 miles southwest
Baldwin Power Station	IL	82.7	89.60	59.20	77.17	site-specific emission factor	32.6 miles southeast
Meramec Power Plant	MO	68.7	213.30	96.80	126.27	published emissions factor	15.9 miles southwest
Mississippi Lime Concrete Plant	MO	54.16	54.73	51.14	53.34	published emissions factor	45.0 miles south
Wood River Power Station	IL	41.3	17.30	13.40	24.00	site-specific emission factor	18.4 miles north
Prairie State Energy Campus	IL	40.0	65.80	74.30	60.03	site-specific emission factor	35.9 miles southeast
Wood River Refinery	IL	20.0	20.00	19.60	19.87	published emissions factor	17.7 miles north
Veolia Incinerator	**IL**	**3.1**	**1.40**	**1.20**	**1.90**	**site-specific emissions monitoring**	**0 miles**

*Values are from each facility's 2013-15 reporting year Form Rs, *at* www.epa.gov/enivro/facts/tri/form_r_search.html.