

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

In the Matter of:)	
)	
VEOLIA ES TECHNICAL)	
SOLUTIONS, L.L.C.)	
)	Appeal No.: CAA 17-02
Permittee)	
)	
Air Pollution Control Title V)	
Permit to Operate)	
Permit No. V-IL-1716300103-2014-10)	
Docket No. U.S.EPA-R05-OAR-2014-0280)	
)	

MOTION FOR LEAVE TO FILE CORRECTED EXHIBIT

Permittee Veolia ES Technical Solutions, L.L.C. (“Veolia”), by and through its undersigned attorneys, respectfully requests the Environmental Appeals Board (“EAB”) grant Veolia leave to file a corrected Exhibit 2 to Veolia’s Petition for Review, listed as Attachment 2 to Veolia’s Petition on the EAB Docket (hereinafter “Exhibit 2/Attachment 2”). In support of this motion, Veolia states the following:

1. On February 15, 2017, Veolia filed its Petition for Review with the EAB, related to Permit No. V-IL-1716300103-2014-10. Veolia filed three exhibits with its Petition for Review, identified on the EAB Docket as Attachment 1, Attachment 2, and Attachment 3, respectively.

2. Subsequent to its filing, Veolia identified a typographical error on the second page (VES 019618) of Veolia Exhibit 2/Attachment 2. Specifically, the amount of mercury emissions reported for US Steel-Granite City for TRI reporting year 2014 was erroneously listed on Veolia’s Exhibit 2/Attachment 2 as “2.84” pounds. The correct amount of mercury emissions reported for US Steel-Granite City for TRI reporting year 2014 is “211.64” pounds. *See* 2014

Form R for US Steel-Granite City, *at*

https://oaspub.epa.gov/enviro/tri_formr_partone_v2.get_thisone?rpt_year=2014&dcn_num=1314212952105&ban_flag=Y. Assigning the correct value to the 2014 reporting year also changed the “3 year average” for US Steel-Granite City to 181.87 pounds instead of the previously calculated 112.27 pounds.

3. In order to correct these typographical errors, Veolia requests leave from the EAB to file the attached corrected Exhibit 2/Attachment 2. The corrections to the second page (VES 019618) of Exhibit 2/Attachment 2 are the only changes made to Exhibit 2/Attachment 2.

4. No parties will be prejudiced by this amendment.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify, pursuant to the Rules of the Environmental Appeals Board of the U.S. Environmental Protection Agency, that on February 27, 2017, the foregoing was filed electronically with the Clerk of the Environmental Appeals Board using the EAB eFiling System, as authorized in the August 12, 2013, Standing Order titled Revised Order Authorizing Electronic Filing Procedures Before The Environmental Appeals Board Not Governed By 40 C.F.R. Part 22. The foregoing is also being served via U.S. Mail in hard copy paper form on the following:

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1200 Pennsylvania Avenue, NW
Mail Code 1103M
Washington, DC 20460-0001

Edward Nam
Director, Air and Radiation Division
USEPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

And via electronic mail to:

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/s/ Joseph M. Kellmeyer
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