



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 03 2008

(A-18J)

Doug Harris, Plant Manager
Veolia Environmental Services, Inc.
7 Mobile Avenue
Sauget, Illinois 62201

Dear Mr. Harris:

The U. S. Environmental Protection Agency is providing you with a preliminary draft of the federal Title V operating permit that EPA is drafting for the Veolia Environmental Services, Inc. facility located in Sauget, Illinois. We are not accepting formal comments or requests for public hearing on the preliminary draft permit. However, you may feel free to give us, by April 15, 2008, informal comments, which we will consider as we progress towards completing the draft Title V permit that we will issue for public comment.

Please note that the preliminary draft permit does not contain operating parameter limits (OPLs) to assure compliance with requirements for pollutants regulated by the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, 40 C.F.R. part 63, subpart EEE (HWC MACT), specifically mercury, arsenic, chromium, beryllium, cadmium, and lead. During our review of the data used to calculate the OPLs in your application, we have identified numerous flaws that compel us to conclude that reliance on these OPLs will not assure Veolia's compliance with the applicable requirements in the HWC MACT. As you are aware, the Illinois Environmental Protection Agency similarly identified problems with the data when it was drafting a Title V operating permit for Veolia under its Clean Air Act Permit Program. Furthermore, because of the lack of usable data, EPA is unable to calculate OPLs to incorporate into the preliminary draft permit.

In accordance with the Request for Information issued on February 22, 2008, Veolia has been required to submit a comprehensive performance test plan for EPA's approval, conduct comprehensive performance tests pursuant to the approved test plan, develop OPLs, and submit an application for a modification to the Title V permit. In order to timely incorporate the OPLs into the Title V permit, we encourage Veolia to comply with the Request for Information as soon as possible. The preliminary draft permit prohibits Veolia's processing of any waste that contains these regulated pollutants.

After Veolia submits the required information, including OPLs, we will review them, and, if appropriate, incorporate them into the Title V permit and remove the prohibition.

If you wish to discuss the preliminary draft permit or to submit informal comments, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton".

Cheryl L. Newton, Acting Director
Air and Radiation Division

Enclosure

cc: David Bender, Garvey, McNeil & McGillivray, SC
Laurel Kroack, Illinois Environmental Protection Agency