



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

REPLY TO THE ATTENTION OF

AUG 01 2008

AR-18J

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

Dear Mr. Harris:

The U.S. Environmental Protection Agency was happy to meet with you and several other representatives of Veolia Environmental Services (Veolia) in Chicago, Illinois on July 29, 2008 to discuss EPA's comments on Veolia's revised test plan submitted to EPA on July 18, 2008. This letter is a summary of the outcomes of this meeting.

Feed rates and extrapolation: Veolia will complete the performance tests in compliance with the June 5, 2008, section 114 request for information and the hazardous waste combustor maximum achievable control technology standard (HWC MACT). Veolia can determine the feed rates it will use during the tests for the mercury, semi-volatile metals, and low volatile metals, but the rate at which Veolia feeds each of the subject pollutants during the tests will be Veolia's operating parameter limit (OPL) for that pollutant. Following review of the test results, EPA will consider Veolia's request to extrapolate. EPA agreed to consider supplemental arguments and information regarding Veolia's request for extrapolation under 40 C.F.R. 63.1209(l) and (n) after receipt of the test results. However, at this time, it is EPA's position that Veolia's stated plan is not consistent with the HWC MACT requirement that testing be conducted at the "extreme range of normal conditions" (*see* 40 C.F.R. § 63.1207(g)); therefore, Veolia's request for extrapolation is not approvable. Further, if, in the future, EPA approves Veolia's request to extrapolate, we do not guarantee the extent to which we will allow the extrapolation.

Arsenic: At this time, EPA requires that Veolia spike arsenic, rather than chromium, during the low volatile metals tests on incinerator 3. Veolia will provide EPA with lab reports documenting the cross-contamination that Veolia believes caused arsenic violations during tests on incinerator 3 in 2004. Following review of the reports, EPA will reconsider the requirement to spike arsenic.

Feed sampling analysis and quality assurance/quality control (QA/QC): Veolia will take sufficient samples to guarantee that it can identify all pollutants in the waste that it feeds during the tests. If there are multiple containers in any lot of waste, Veolia will sample and test any containers that are not identical to others that are tested. Veolia also will take additional feed samples during the tests if requested by EPA personnel who are observing the tests. Veolia will comply with the other sampling and QA/QC conditions raised during the meeting.

Carbon injection rate for incinerator 4: Veolia intends to inject carbon at incinerator 4 at the rate of approximately 6.5 pounds per hour. Veolia had included in its test plan a range for the carbon injection rate because it could not state with certainty what rate it actually will use during the test. Veolia will record the actual rate of carbon injection during the tests.

Analysis of metals in fuels: Veolia no longer burns #2 fuel oil, and will burn only natural gas during the tests. After researching the amounts of metals, particularly mercury, found in natural gas, Veolia concluded that the levels of metals are negligible, and, therefore, will not consider metal emissions from the natural gas in the test.

If you have any questions, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,


Pamela Blakley, Chief
Air Permits Section