



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



REPLY TO THE ATTENTION OF:

Douglas Harris, General Manager
Veolia ES Technical Solutions, L.L.C.
7 Mobile Avenue
Sauget, Illinois 62201

Re: Notification of Incompleteness of 40 C.F.R. Part 71 Permit Renewal Application

Dear Mr. Harris:

The U.S. Environmental Protection Agency has reviewed the Clean Air Act (CAA) Title V permit renewal application that Veolia ES Technical Solutions, L.L.C., Sauget, Illinois (Veolia) submitted on April 9, 2013. Veolia operates under a federal Title V Permit to Operate No. V-IL-12716300103-08-01, which EPA issued on September 12, 2008, pursuant to Title V of the CAA and its implementing regulations at 40 C.F.R. Part 71. Veolia's permit expires on October 12, 2013. Pursuant to 40 C.F.R. § 71.5(a)(1)(iii), Veolia's renewal application is timely.

EPA has reviewed Veolia's Title V permit renewal application for completeness pursuant to the criteria in 40 C.F.R. § 71.5(a)(2), which requires, among other things, that the information in the application must be sufficient to evaluate the subject source and its application and to determine all applicable requirements. EPA has determined that Veolia's Title V permit renewal application is **incomplete**. In order for EPA to deem the renewal application complete and for Veolia to continue to operate under its existing permit until EPA issues a renewed permit, Veolia must submit the following information **no later than August 1, 2013**:

1. Citation and description of all applicable requirements. Pursuant to 40 C.F.R. § 71.5(c)(4), the renewal application must include: (i) citations to and descriptions of all applicable requirements, and (ii) a description of, or reference to, any applicable test method for determining compliance with each applicable requirement. Pursuant to 40 C.F.R. § 71.5(c)(3)(vi), Veolia must identify any restrictions on source operation that affect emissions or any work practice standards, where applicable, for all regulated pollutants at the source.

2. Initial compliance plan and compliance certification. Pursuant to 40 C.F.R. § 71.5(c)(8) and (9), Veolia must provide the facility's compliance status and compliance plan for each unique combination of applicable requirements and emissions units at the facility. You must list all compliance methods (e.g., monitoring, recordkeeping and reporting) you used to determine compliance with each applicable requirement. For all requirements for which the source is not in compliance, you must include a compliance schedule. Veolia may submit the information required by 40 C.F.R. § 71.5(c)(8) and (9) on EPA Form 5900-86 (I-COMP), which is available at: <http://www.epa.gov/air/oaqps/permits/p71forms.html>.
3. Description and justification of emissions estimation methods. Pursuant to 40 C.F.R. § 71.5(c)(3)(viii), Veolia must provide sample calculations and the necessary documentation upon which you relied to estimate emissions from each emissions unit (e.g., copies of relevant pages of stack test reports, AP-42 section(s), industry publications, etc).¹ If emission factors are used, Veolia must explain whether or not more accurate emissions estimation methods are available for the source, and how you determined that the emission factors you chose are applicable to your specific source. *See In the Matter of United States Steel Corporation – Granite City Works*, Petition Number V -2009-03 (January 31, 2011) at 14.
4. A listing of all active air permits and consent orders (if applicable) issued by a state or federal agency. EPA believes that Veolia has received several construction permits, and therefore, that the information provided in Section K, Form 5900-79 (GIS) is not complete. For each active permit, please identify the permitting authority, the date the permit was issued, date of expiration (if applicable), and type of permit (e.g., construction, operating, etc).
5. Process flow diagrams showing all emissions units and air pollution control equipment, and a plot plan showing buildings and process areas. Veolia must label the emission points, process equipment, air pollution control equipment, stacks and vents.
6. A listing and description of any inapplicable requirements, for which Veolia desires a nonapplicability determination in the permit. Veolia must identify and include a concise summary of any inapplicable requirements as well as a complete explanation of why Veolia believes each is not applicable to your source. Pursuant to 40 C.F.R. § 71.6(f), EPA may only extend a permit shield to requirements that are included and are specifically identified in the permit, or EPA, in acting on the permit application or

¹ Note that the sample volatile organic material (VOM) emissions calculation provided on page 20 (Appendix A) for the "Drum Crusher" refers to "Summation of Pounds VOM from Column J above;" however, Column J of the table on Page 19 is titled "Comments." This is probably a typographical error.

revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

Should Veolia wish to request confidential treatment for business information, such information must be submitted separately along with a claim of confidentiality as provided in 40 C.F.R. Part 2, Subpart B. All confidential business information must be clearly and properly marked, and copies of the renewal application suitable for public inspection must be submitted. EPA will process all business confidentiality claims following the procedures found in 40 C.F.R. Part 2.

Consistent with 40 C.F.R. § 71.5(d), the responsible official must certify all information Veolia submits in response to this request. EPA is available to meet or teleconference with you to clarify any of the information requested in this letter. To arrange a meeting or teleconference, or if you have any questions, please contact David Ogulei, of my staff, at (312) 353-0987.

Sincerely,


Genevieve Damico
Chief
Air Permits Section