

## E R R A T A

Date: November 6, 2007

Subject: Correction to U.S. EPA, "Risk Screening and Risk Management Recommendations for: Veolia ES Technical Solutions, L.L.C., Sauget, Illinois," dated May 2007

From: Todd D. Ramaly, United States Environmental Protection Agency *TDR*

To: File

The "Risk Screening and Risk Management Recommendations for Veolia ES Technical Solutions, L.L.C., Sauget, Illinois," dated May 2007, (the "Veolia Risk Report") evaluated whether compliance by the Veolia facility with the emission standards for certain hazardous constituents established by 40 CFR Part 63, Subpart EEE (the "Hazardous Waste Combustion – Maximum Achievable Control Technology Rule" or "HWC-MACT Rule") alone would be protective of human health. The HWC-MACT Rule provides for interim emissions standards (40 CFR § 63.1203(a)) and replacement emissions standards (40 CFR § 63.1219(a)). Existing hazardous waste incinerators, such as the Veolia facility, currently must comply with the interim emissions standards (40 CFR § 63.1206(a)). Unless an extension is granted, the Veolia facility must comply with the more stringent replacement emissions standards no later than October 14, 2008 (40 CFR § 63.1206(a)). The two sets of emissions standards are similar. However, with respect to emissions limits for semi-volatile metals (lead and cadmium) and low-volatile metals (arsenic, beryllium, and chromium), the replacement emissions standards are more stringent than the interim emissions standards. Specifically, the interim emission standards prohibit emissions of semi-volatile metals in excess of 240 micrograms per dry-standard cubic meter ( $\mu\text{g}/\text{dscm}$ ) and low-volatile metals in excess of 97  $\mu\text{g}/\text{dscm}$  while the replacement emissions standards more stringently prohibit emissions of semi-volatile metals in excess of 230  $\mu\text{g}/\text{dscm}$  and low-volatile metals in excess of 92  $\mu\text{g}/\text{dscm}$ . For the other hazardous constituents evaluated for risk by the Veolia Risk Report, i.e., dioxins and mercury, the interim emissions standards and the replacement emissions standards applicable to the Veolia facility are identical.

The report's conclusions on risks to human health are based on the calculation of emission rates from the Veolia facility at the replacement emissions standards (found in Attachment A to the report). The replacement emissions standards represent the compliance point for the foreseeable future (as of October 2008) and are an appropriate evaluation of the risk during the life of the proposed permit. However, the narrative portion of the report erroneously cites to the interim emissions standards. In each instance where the narrative portion of the report cites to the interim emissions standards, the replacement emissions standards should have been cited. Specific corrections to the text of the Veolia Risk Report are made below.

If the calculation of emission rates from the Veolia facility were to be based on the interim emissions standards, we estimate that there would be a corresponding approximate 4-5% increase in the cancer and hazard risks over those stated in the Veolia Risk Report for low- and semi-volatile metals. The risks from emissions of low- and semi-volatile metals at the replacement emissions standards as stated in the report were well below risk levels of concern. An approximate 4-5% increase in cancer and hazard risks for low and semi-volatile metals would remain well below levels of concern. Therefore, the ultimate conclusion of the risk assessment for low and semi- metals, i.e., no additional limits on low and semi-volatile metals are necessary to protect human health, would be the same regardless of whether emissions were calculated at the interim emissions standards or at the replacement emissions standards.

Corrections:

1. Veolia Risk Report, p. 8, 4<sup>th</sup> para., 1<sup>st</sup> sentence: The Code of Federal Regulations citation should be replaced with “(40 CFR § 63.1219(a)(1)(i)).”
2. Veolia Risk Report, p. 14, Part B, 2<sup>nd</sup> para., 2<sup>nd</sup> sentence: The sentence should read: “The HWC-MACT standard limit for semi-volatile metals is 230 µg/dscm.”
3. Veolia Risk Report, p. 17, 4<sup>th</sup> para: The paragraph should be replaced with the following:

“The HWC-MACT Rule metals emission limits for existing hazardous waste incinerators at 40 CFR § 63.1219(a) are given in the stack gas as follows:

Semi-volatile Metals – lead and cadmium (Pb and Cd): 230 µg/dscm, combined emissions, corrected to 7 % oxygen.

Low Volatility Metals – arsenic, beryllium, and chromium (As, Be and Cr+6): 92 µg/dscm, combined emissions, corrected to 7 % oxygen.

Mercury (Hg): 130 µg/dscm corrected to 7 percent oxygen.”

4. Veolia Risk Report, p. 18, 1<sup>st</sup> full para., 1<sup>st</sup> sentence. The parenthetical in this sentence should be replaced with the following: “(e.g., Pb at 230 µg/dscm; Cd at 230 µg/dscm, etc.).”
5. Veolia Risk Report, p. 19, last sentence: This sentence should be replaced with the following: “In addition, because new mercury emission limits became applicable to the Veolia facility, this screening assessment now uses mercury emissions at the new MACT-imposed emission limit as its starting point.”
6. Veolia Risk Report, p. 20, Lead: The sentence appearing under the heading “Lead” should refer to “230 µg/dscm” not “240 µg/dscm.”

7. Veolia Risk Report, p. 20, Cadmium, 1<sup>st</sup> sentence: The first sentence appearing under the heading "Cadmium" should refer to "230 µg/dscm" not "240 µg/dscm."
8. Veolia Risk Report, p. 20, Hexavalent Chromium, 1<sup>st</sup> sentence: The first sentence appearing under the heading "Hexavalent Chromium" should refer to "92 µg/dscm" not "97 µg/dscm."
9. Veolia Risk Report, p. 21, Beryllium, 1<sup>st</sup> sentence: The first sentence appearing under the heading "Beryllium" should refer to "92 µg/dscm" not "97 µg/dscm."
10. Veolia Risk Report, p. 21, Arsenic, 1<sup>st</sup> sentence: The first sentence appearing under the heading "Arsenic" should refer to "92 µg/dscm" not "97 µg/dscm."