



Stericycle
Protecting People. Reducing Risk.

May 23, 2011

Illinois Pollution Control Board
Attn: Kathleen Crowley, Hearing Officer
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218

RE: Stericycle, Inc. Response to April 20, 2011 Hearing Officer Order and Coordination with IEPA regarding Amendments to 35 Ill. Adm. Code Part 229: HMIWI

Dear Hearing Officer,

Stericycle, Inc. (Stericycle) owns and operates a hospital/medical/infectious waste incineration facility located in Clinton, Illinois. Stericycle is subject to the Illinois regulations (35 Ill. Adm. Code Part 229 Hospital/Medical/Infectious Waste Incinerators) that were developed to comply with the US EPA "Emission Guidelines for Existing Hospital, Medical and Infectious Waste Incinerators (HMIWI)" (40 CFR Part 60, Subpart Ce).

In order to provide comments on 35 Ill. Adm. Code Part 229, Stericycle provided pre-filed testimony to the Illinois Pollution Control Board on February 22, 2011. The Illinois Pollution Control Board, in an April 20, 2011 Hearing Officer Order, requested that Stericycle respond in writing in advance of hearing, on or before May 23, 2011. Stericycle understands that public hearings have been rescheduled for June 8, 2011 and June 28, 2011.

The board asked Stericycle to address the following related to Section 229.184, Reporting Requirements:

Stericycle's pre-filed testimony provides an alternative proposal for the compliance scheduled proposed by IEPA in Section 229.115(b)(2)(B)(i) – (v) for HMIWI. Stericycle's proposed date to complete the initial performance test [Section 229.115(b)(2)(B)(v)] is "August 2, 2014." Stericycle is requested to please clarify whether the reporting requirements deadline of January 1, 2014 under Section 229.184(c)(2) needs to account for the extended compliance timeframe of 229.115(b)(2). If so, Stericycle is requested to please suggest an alternate date of compliance for reporting requirements. [Stericycle comment: Based on our discussions with the IEPA, we understand that these dates will be adjusted accordingly per the original pre-filed testimony by Stericycle.]

Additionally, the board encouraged the Agency (or the Illinois Environmental Protection Agency, or IEPA) and Stericycle to consider the IEPA's proposed rule and Stericycle's previously filed testimony concerning the proposed compliance dates.

At the board's recommendation, IEPA, Stericycle, and All4 Inc. discussed the following topics via phone conversations and emails. Specifically, on May 13, 2011, Stericycle's Selin Hoboy and Jim Nold and IEPA's Dixon Nwaji and Charles Matoesian held a conference call. On May 17, 2011 IEPA's Dixon Nwaji followed up with a subsequent question via email and on May 18, 2011, Stericycle's Jim Nold, ALL4's Kristin Gordon and IEPA's Dixon Nwaji held a conference call. The conclusions of the discussions are as follows:

1. Stericycle and IEPA discussed Stericycle's proposed extended compliance timeframe and are recommending a revised schedule, which is provided in the table below for reference:

Increments of progress	Stericycle Proposed Date
Stericycle will submit Construction Permit Application	January 1, 2012
i) Finalize all contracts for the purchase of either pollution control equipment, process modification or control systems	August 1, 2012
ii) Commence the implementation of either the process modifications or the necessary construction or installation of air pollution control devices for the HMIWI	March 1, 2013
iii) Complete either the process modifications or the installation or construction of the new air pollution control equipment	September 1, 2013
iv) Final Compliance ^(a)	June 21, 2014
v) Complete the initial performance test in accordance with Section 229.142 of this Part ^(b)	October 6, 2014

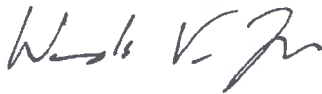
- (a) As part of Final Compliance, Stericycle will complete shakedown activities including an evaluation of the APC system. The APC evaluation will require engineering evaluations to confirm proper system operation and the ability to demonstrate compliance with the new limits over a variety of operating conditions and waste feed scenarios. Actual shakedown of the HMIWI with retrofit APC will include lining up APC vendors and a possible testing company for engineering data, performing engineering evaluations, analyzing data, and possibly re-evaluating or making minor system adjustments, as necessary, to demonstrate future compliance. This is especially true with the very low emission limits associated with the new rule. Reliable compliance with these limits will likely require a lengthy shakedown period. As a result, Stericycle must plan for contingency time to perform the shakedown of the new equipment at the Clinton facility in advance of conducting the Initial Performance Test. Per discussions with IEPA, to be in "Final Compliance" means to incorporate all process changes or complete retrofit construction in accordance with the final control plan and to connect the air pollution control changes or process changes such that, if the HMIWI is brought on line, all necessary process changes or air pollution control equipment will operate as designed.
- (b) Upon successful shakedown and Final Compliance, Stericycle will conduct the initial performance testing. Actual testing of the HMIWI with retrofit APC will include developing a test protocol, scheduling a testing company, submitting the protocol to IEPA for approval, performing the compliance test, receiving the test results, and submitting the test results to IEPA to demonstrate compliance with the

new emission limits. On or after the date on which the initial performance test is completed or is required to be completed, whichever date comes first, Stericycle shall not cause to be discharged to the atmosphere any gases that contain stack emissions in excess of the limits presented in Section 229.125 (c).

2. Stericycle will submit written documentation to IEPA to confirm that each of the above increments of progress are satisfied per agreed upon timelines and procedures as determined in the Construction Permit Application process.
3. Stericycle will submit a construction permit application to IEPA no later than January 1, 2012 which will address the retrofit activities that Stericycle will perform in order to demonstrate compliance with the Section 229.125(c) emission limits.
4. Stericycle will continue to comply with the recordkeeping and reporting requirements of Stericycle's current CAAPP. Once the CAAPP is revised to incorporate the retrofit activities, which will be permitted initially via the construction permit process, Stericycle will meet the revised recordkeeping and reporting requirements. By complying with their CAAPP, Stericycle will meet the intent of Section 229.184(c). Stericycle also understands that IEPA will remove the January 1, 2014 dates associated with Section 229.184(c). Stericycle believes that this discussion and approach; that IEPA and Stericycle have agreed to, serves as an appropriate response to the Board's question to Stericycle regarding Section 229.184.

Thank you for your consideration of Stericycle's response. Stericycle looks forward to working with the Illinois Pollution Control Board and IEPA as 35 Ill. Adm. Code Part 229 is finalized. Should you have any questions in the interim, please do not hesitate to contact me at shoboy@stericycle.com or 847-943-6685.

Sincerely,
Stericycle, Inc.



Selin Hoboy
VP – Legislative and Regulatory Affairs

Cc: Rick Gabey, Stericycle
Jim Nold, Stericycle
Wade Van Zee, Stericycle
Kristin Gordon/William Straub, All4 Inc.