



## *FREQUENTLY ASKED QUESTIONS*

### Stericycle Relocation to Tooele County

#### ***WHY IS STERICYCLE RELOCATING TO TOOEELE COUNTY?***

In 2013, the Division of Air Quality (DAQ) issued a Notice of Violation (NOV) to Stericycle for permit violations that occurred between 2011 and 2013 at its North Salt Lake facility. DEQ and Stericycle reached a Settlement Agreement for the NOV in 2014. Terms of the agreement included a total penalty of approximately \$2.3 million and relocation of the facility to Tooele County.

#### ***DEQ CITED STERICYCLE FOR PERMIT VIOLATIONS AT ITS NORTH SALT LAKE FACILITY. WHY WOULD THE AGENCY ALLOW THE COMPANY TO BUILD A NEW WASTE INCINERATOR?***

Our role as a regulatory agency is to analyze and evaluate proposed projects that are submitted to us and determine whether or not they meet federal and state air quality requirements, including the [National Ambient Air Quality Standards \(NAAQS\)](#) and federal emission limits for hazardous air pollutants (HAPs). We cannot, by law, deny a permit to a facility that meets federal and state air quality standards.

We can and do require facilities to use the appropriate pollution controls, including [Best Available Control Technology \(BACT\)](#), to lower their emissions. We also include monitoring, testing, and reporting requirements in the permit to ensure that facility operations are in compliance with all applicable laws and rules. Stericycle's permit is subject to these federal and state control and compliance requirements.

#### ***ARE THERE ANY MAJOR DIFFERENCES BETWEEN THE PROPOSED FACILITY AND THE NEW FACILITY?***

The proposed plant is subject to more stringent emission and operational requirements under the Clean Air Act's new source performance standards (NSPS) for [Hospital, Medical, and Industrial Waste Incineration \(HMIWI\)](#) than the North Salt Lake facility because it is considered a new source.

The Tooele plant will have two incineration units rather than one, each with its own air pollution control (APC) system. In addition to the individualized APC systems, the proposed Tooele facility will use the latest pollution control equipment throughout the process, deliver a better interface between pollution control technologies, and provide continuous emission monitoring (CEM) for nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO).

#### ***THE TOOEELE FACILITY WILL PROCESS ALMOST TWICE AS MUCH WASTE AS THE NORTH SALT LAKE PLANT. WON'T THAT MEAN DOUBLE THE POLLUTION?***

Not necessarily. Emissions for particulate matter, for example, will be less than double due to new equipment and stricter permitting requirements that affect Stericycle's permitted potential-to-emit (PTE) — the

maximum amount of specific pollutants that a source is allowed to emit. All PTE levels for the Tooele facility comply with federal NAAQS and HAPs emission requirements. It's important to note that PTE is the maximum level allowed, and that the actual emissions of most facilities, including Stericycle, are generally lower than the maximum.

***WHY DOES THE PERMIT ALLOW STERICYCLE TO CONTROL NOX EMISSIONS THROUGH SELECTIVE NON-CATALYTIC REDUCTION (SNCR) RATHER THAN SELECTIVE CATALYTIC REDUCTION (SCR)?***

DAQ conducts a rigorous BACT review on all of its permits to evaluate control technologies and the energy, environmental, and economic impacts of each. The division uses federal guidelines to weigh the availability, cost, and technical feasibility of proposed equipment and makes a determination by taking all of these factors into account.

While SCR removes a higher percentage of the NOx emissions than SNCR, it is prohibitively expensive. SNCR technology best meets the criteria while providing emission reductions that meet federal air quality standards.

***HOW WILL THE PERMIT PROTECT PEOPLE FROM HAP EMISSIONS SUCH AS DIOXIN/ FURAN?***

Again, because the Tooele facility is a new source, it must meet stricter HAP standards under [federal law](#). Updated emission control equipment and a process design for residency time in the secondary combustion chamber of at least two seconds at 1,800° F (the time and temperature necessary to destroy these pollutants) will help ensure that HAPs emissions remain well below established health thresholds.

***THE FREQUENT USE OF THE EMERGENCY BYPASS STACK WAS A SERIOUS PROBLEM AT THE NORTH SALT LAKE FACILITY. WILL THAT CONTINUE TO BE AN ISSUE AT THE NEW FACILITY?***

Incinerators at the Tooele facility are subject to [stricter requirements](#) than the North Salt Lake facility. Under these stricter requirements, the use of an emergency bypass stack outside of startup, shutdown, or malfunction is a violation of emission limits. Continuous monitoring will identify whether a bypass incident has occurred, and DAQ's compliance section will take the appropriate actions to deal with any violations.

***WHY IS THE TOOELE FACILITY CONSIDERED A MINOR SOURCE?***

According to [state rules](#), a minor source is any stationary source that emits or has the potential to emit less than 100 tons per year of any pollutant subject to regulation under the Clean Air Act. The new facility, including both incinerators, meets that criterion.

***IF THE NEW FACILITY IS A MINOR SOURCE, WHY DOES IT REQUIRE A TITLE V PERMIT?***

[Federal regulations](#) require HMIWI facilities to operate under a [Title V permit](#) regardless of whether they are a major or minor source.

***IS WASTE PROCESSING AT STERICYCLE PART OF THIS PERMIT?***

No. DEQ's [Division of Waste Management and Radiation Control \(WMRC\)](#) will issue a separate [solid waste permit](#) and oversee development of a waste management plan. DAQ is working closely with WMRC to ensure that the requirements in the two permits are compatible. The new Stericycle facility will receive and incinerate packaged medical waste using a process similar to its current North Salt Lake facility and will use waste acceptance and management procedures that will comply with the emission levels established in this permit.

For more information, please visit our Stericycle webpages at <http://www.deq.utah.gov/businesses/S/Stericycle/tooelefacility.htm>