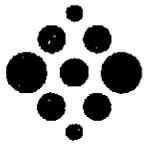


MAY 28 2014

DIVISION OF AIR QUALITY



Stericycle
Protecting People. Reducing Risk.

REVIEWED

Initials: JM Date: 5/27/14

Compliance Status: To file

File# B-2-10142

May 28, 2014

Mr. Harold Burge
State of Utah, Utah Division of Air Quality
150 North 1950 West
PO Box 144820
Salt Lake City, UT 84114-4820

RE: Notification of Unavoidable Breakdown in Accordance with R307-107 for May 21, 2014 Bypass Event; Report of Deviation

Dear Mr. Burge:

Stericycle Inc. operates a hospital/medical/infectious waste incinerator in North Salt Lake City pursuant to Title V Operating Permit 1100055002. This letter provides a follow-up written report to a bypass incident that occurred as the result of multiple power outages on May 21, 2014. Initial notification by Al Burson was provided via e-mail on May 21, 2014. This report provides supplemental information.

On May 21, 2014, at 4:56 pm, Stericycle experienced multiple power outages which caused the bypass cap to open. These power outages were the result of a vehicle striking and downing an electric power line pole (i.e. there were intermittent starts and stops before line power was continuously reestablished). The multiple power outages also caused the PLC to lock further causing a delay in closing the cap.

In order to minimize emissions as a result of the bypass, waste feed to the incinerator ceased automatically when the bypass cap opened. Additionally, Stericycle's field services team worked to reset the PLC. This was successfully completed and the bypass cap closed at 5:26 pm. An estimate of the emissions released during the incident is provided in the attached table.

In order to prevent the recurrence of a similar event, Stericycle has applied for approval to install a new emergency generator. The new generator will have a quicker start time and be able to handle full plant operations during power outages and thereby minimize bypass events due to power loss. Stericycle expects to receive a revised AO from UDAQ in the near future at which time it will expedite installation of the new emergency generator.

Finally, Stericycle notes that it is submitting this report as requested by UDAQ and notwithstanding that the current permit provides that otherwise applicable emission limits do not apply during malfunction conditions so long as no waste is charged during the malfunction. Condition II.B.3.c(f). To the extent applicable, this report is intended to satisfy the requirements of R307-107 as well as the deviation reporting requirements of the Title V operating permit.

Document Date 5/28/2014

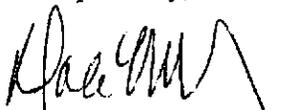


DAQ-2014-011271

If you have any questions, please feel free to contact me or Al Burson (847) 370-7995.

In accordance with Operating Permit Condition I.K, based on information and belief formed after reasonable inquiry, I certify that the statements and information in this report are true, accurate, and complete.

Respectfully,

A handwritten signature in black ink, appearing to read "Dale Rich", with a long, sweeping horizontal stroke extending to the right.

Dale Rich
Regional Operations Director
Stericycle, Inc.
Responsible official as defined in R307-415-3

Table 1
STERICYCLE, INC.
Incinerator Bypass Emissions - Bypass Event 5/21/2014

Pollutant	Bypass Emission Rates ^{(a)(b)}		
	Emission Factor	Units	tons/event
NOx	3.56	lb/ton	8.83E-04
PM/PM10	4.67	lb/ton	1.16E-03
SO ₂	2.17	lb/ton	5.38E-04
CO	0.10	lb/ton	2.55E-05
VOC	0.299	lb/ton	7.42E-05
Lead	7.28E-02	lb/ton	1.81E-05
Hydrogen Chloride	33.5	lb/ton	8.31E-03
Hydrogen Fluoride	0.149	lb/ton	3.70E-05
Cadmium	5.48E-03	lb/ton	1.36E-06
Mercury	0.107	lb/ton	2.65E-05
Dioxins/Furans	6.14E-07	lb/ton	1.52E-10

^(a) Data calculated using the following, in order of priority and applicability:

- Most recent stack test results
- EPA published emission factors
- Engineering estimates

^(b) Data from this bypass generated using an estimated duration time of 30 minutes.