



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/05/2024	
Media Program:	Air	
Regulatory Program(s)	Title V, NESHAP	
Company Name:	Veolia ES Technical Solutions, LLC	
Facility Name:	Veolia ES Technical Solutions Beaumont	
Facility Physical Location:	7665 Highway 73	
(city, state, zip code)	Beaumont Texas 77705	
Mailing address:	7665 Highway 73	
(city, state, zip code)	Beaumont Texas 77705	
County/Parish:	Jefferson County	
Facility Phone Number	409-289-2074	
Facility Contact:	Randa Coffey	Environmental Compliance Supervisor
	randa.coffey@veolia.com	
FRS Number:	110035783658	
Identification/Permit Number:	O1509	
Media Identifier Number:	48-245-00118	
NAICS:	562211	
SIC:	4953	
Personnel participating in inspection:		
Justin Chen	Region 6 ECDAT	Environmental Engineer
Benjamin Donaldson	Region 6 ECDAT	Environmental Engineer
Kenneth McPherson	Region 6 ECDAT	Life Scientist
Daniel Hoyt	OECA AED	Environmental Engineer
Nathan Hicks	OECA AED	Physical Scientist
Richard Helmich	NEIC	Chemist
Philip Myer	NEIC	Mechanical Engineer
Ron Constance	Veolia	Plant Manager
Dietrich Hovener	Veolia	Incineration Manager
Daniel Schofield	Veolia	Health and Safety Manager
Randa Coffey	Veolia	Environmental Supervisor
EPA Lead Inspector Signature/Date		
	Justin Chen	Date
Supervisor Signature/Date		
	James Leathers	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Justin Chen (R6 ECDAT), Benjamin Donaldson (R6 ECDAT), Kenneth McPherson (R6 ECDAT), Daniel Hoyt (OECA AED), and Nathan Hicks (OECA AED) accompanied by Philip Myers and Richard Helmich (National Enforcement Investigations Center, “NEIC”) arrived at the Veolia ES Technical Solutions Beaumont (“Veolia”) at 9:24 AM on February 5, 2024, for an unannounced inspection. We met with Ron Constance/Plant Manager, Dietrich Hovener/Incineration Manager, and Daniel Schofield/Health and Safety Manager. Randa Coffey, Environmental Supervisor at Veolia, joined the inspection party during the facility tour. Credentials were presented to Ron Constance and he was informed that this was an EPA inspection to evaluate potential sources of excess emissions using EPA’s Geospatial Measurement of Air Pollution (“GMAP”) vehicle and to evaluate compliance with the facility’s Title V Air Permit and the Clean Air Act. The scope of the inspection is a partial evaluation (“PCE”). This inspection occurred as part of a multi-scale monitoring project in the Beaumont-Port Arthur area. The Opening Conference Sign-In Sheets are attached as Appendix 1.

FACILITY DESCRIPTION

Veolia is a Hazardous Waste Treatment and Disposal facility located near Port Arthur (Jefferson County). There are 231 employees (not including contractors) who work at the facility, which operates 8760 hours per year. The Veolia facility receives hazardous wastes and non-hazardous wastes from off-site sources. The facility also generates waste streams from its operations. Wastes received by the facility are categorized as gaseous, energetic pumpable, aqueous, non-pumpable, containerized that may be received in bulk containers (roll-off bins, end dumps, and tanker trucks) and/or smaller-volume containers such as boxes, pails, and drums. Veolia operates an Incinerator Train which consists of a 60 feet Rotary Kiln and a Secondary Combustion Chamber (SCC). This incinerator train operates approximately 8000 hours per year depending on maintenance turnover time. The facility operates under CAA Title V major source permit number O1509 issued on December 29, 2023, and a RCRA Industrial Hazardous Waste Storage and Treatment permit number HW-50212-001 issued on May 24, 2019.

Section II - OBSERVATIONS

The NEIC GMAP was driven by Richard Helmich and the instruments were operated by Philip Myers. Facility representatives Ron Constance, Dietrich Hovener, and Daniel Schofield led the GMAP in their vehicle. Randa Coffey, Environmental Supervisor, joined the facility representatives while we were touring the facility. Conditions were overcast and cloudy. Inspectors Justin Chen, Benjamin Donaldson, Kenneth McPherson, Daniel Hoyt, and Nathan Hicks followed the GMAP in secondary vehicles. Daniel Hoyt and Nathan Hicks operated a Data Acquisition in Real Time (DART) unit on their vehicle, equipped with a photoionization detector (PID) that measures volatile organic compounds (“VOC”) in the air, and a wind monitor that monitors wind speed, wind direction and geolocation. The DART unit had a 10.6ev PID installed. The GMAP drove on all available facility roads measuring air pollutant concentrations downwind of each of the process areas, if possible. The GMAP driving tour began by driving around the

perimeter of the entire facility. We then drove around the perimeter of the treatment, storage, and disposal facility. Downwind of the Incinerator Stack, the GMAP noted an 80 parts per billion (“ppb”) reading of VOC between 10:25 to 10:40AM. The GMAP was also downwind of a barrel storage area. The DART equipped vehicle detected a 60 ppb reading of VOC at this same location and time period. We then drove by the deep well injection tank. A full report from the GMAP will be issued by NEIC at a later date.

The site GMAP survey ended at 11:30AM and we returned to the administrative building.

Section III – AREAS OF CONCERN

Justin Chen conducted a closing conference at Veolia at 11:30AM on February 5, 2024, for the inspection. Mr. Meyers and Mr. Chen summarized the facility tour and presented their emissions observations, including the following Areas of Concern, a measurement of 80ppb of VOCs south of the stabilization building and incinerator stack. The facility made no claims of confidential business information as no documents, photos, or video were taken. We departed the facility at 11:45AM.

Section IV – FOLLOW UP

The following information was received by EPA on February 22, 2024, after exiting the Facility on February 5, 2024:

- Number of Veolia employees at the facility (231, not including contractors).
- Operating hours of the facility (8760 hours per year).
- Information on the Risk Management Program (“RMP”) program level of the facility (“The facility currently does not have a RMP covered process because inventory levels of all regulated substances remain below threshold quantities.”)

On February 29, 2024, the EPA received distributed control system (“DCS”) continuous emission monitoring system (“CEMS”) data pertaining to the incinerator from the facility for operations on February 5, 2024, between 10:25AM to 10:40AM. This was the period of time during which the GMAP detected an 80 ppb VOCs downwind of the incinerator stack. The DCS data included constituent chemicals that were monitored including chlorine, individual metals, polychlorinated biphenyls (“PCB”), dioxin/furans, and organic content. The data set also included total waste input feed, operating conditions of the incinerator (kiln temperature, exhaust temperature, stack flow rate, kiln pressure, and combustion efficiency), and stack CEMS measurements (carbon monoxide, hydrogen chloride, sulfur dioxide, and carbon dioxide).

Section V – LIST OF APPENDICES

There were no photos or videos taken at the facility.

Appendix 1 – Opening and Closing Conference Sign-in Sheets

Appendix 1

Opening and Closing Conference Sign-In Sheets

FRS ID110035783658 Veolia ES Technical Solutions

Page 4 of 20

Opening/Pre-Inspection MeetingCommence opening/pre-inspection meeting _____ Time: 945

Name	Title	Representing	Telephone No.
Richard Helmich	Chemist	EPA	303-262-9149
Justin Lee	Env Engineer	EPA	214 665 2273
Philip Myers	Mech. Engineer	EPA	(303) 462 9301
Ben Donaldson	Env. Engineer	EPA ROB	214-665- 7553 ⁷⁴²⁶
Daniel Hoyt	Env. Engineer	EPA HQ	202 564 7898
Kenneth R. McPherson	LIFE SCIENTIST	EPA Region 6	214-665-6754
Nathan Hicks	Physical Scientist	EPA HQ	865-878-0343
Ron Constance	Plant Mgr	Veolia	409.289-2074
DIETRICH HOVENER	INCINERATION MGR	VEOLIA	409.718 6663
Daniel Schofield	Health + Safety Mgr	Veolia	409-540-5902

Conclude opening/pre-inspection meeting _____ Time: 1009Initials / Date: X 1/25/24

FRS ID110035783658 Veolia ES Technical Solutions

Page 16 of 20

Exit interview / Out-briefing Meeting

Commenced meeting..... Time: 1130

Name	Title	Representing	Telephone No.
Justin Chen	Env Engineer	USEPA	214 665 2273
Nathan Elie	Physical scientist	EPA	865-898-0343
Kenneth McPherson	LIFE SCIENTIST	EPA 126	214-665-6754
Philip Myers	Mech. Engineer	EPA	(803) 462-9301
Ben Donaldson	Env Eng	EPA	214 665-7426
ALBERT FALA	EHS MANAGER	VEOLIA	409 736 4138
DANIEL SCHOFIELD	H+S Manager	VEOLIA	409-540-5902
Randa Coffey	Env. Compliance Sup.	Veolia	409-736-4128
Ron Constance	Plant Mgr	Veolia	409-289-2074
Daniel Hoyt	Env. Eng	EPA	202 564 7898
DIETRICH HÖVENER	INCINERATION MGR.	VEOLIA	409 718 66 63

Conclude meeting..... Time: 1145

Initials / Date: X, 2/5/25