

**Oklahoma Department of Environmental Quality
Response to Public Comments
Tier III Permit Application and Draft Permit Modification
Reworld Tulsa, Tulsa County
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October 9, 2025

The following includes public comments received by the Land Protection Division at the Oklahoma Department of Environmental Quality on the Reworld Tulsa Tier III Permit Modification Application (“Application”) and Draft Permit Modification. The Application requests to modify Reworld Tulsa’s existing solid waste permit, Permit No. 3572033, to allow for the acceptance of regulated medical waste (“RMW”). A list of acronyms and a brief history has been provided for clarification prior to the response to comments.

List of Acronyms

DEQ/ODEQ – Oklahoma Department of Environmental Quality
OAC – Oklahoma Administrative Code
O.S. – Oklahoma Statutes
CFR – Code of Federal Regulations
EPA- Environmental Protection Agency
LLC – Limited Liability Company
RMW – Regulated Medical Waste
MSW – Municipal Solid Waste
NHIW – Non-Hazardous Industrial Waste
TARE – Tulsa Authority for the Recovery of Energy
TCLP – Toxic Characteristic Leaching Procedure
CO – Carbon Monoxide
NO_x – Nitrous Oxides
SO₂ – Sulfur Dioxide
PM – Particulate Matter
PM 2.5 – Particulate Matter with a diameter of 2.5 micrometers or less
PM 10 – Particulate Matter with a diameter of 10 micrometers or less
RCRA – Resource Conservation and Recovery Act

History

DEQ received the Application requesting to modify Reworld Tulsa’s existing solid waste permit, Permit No. 3572033, to accept RMW as a waste stream. The Application, dated November 12, 2023, was submitted by Third Branch Engineering on behalf of Reworld Tulsa, LLC. The application notice of filing was published in *Tulsa World*, Tulsa, Oklahoma, on February 24, 2024. DEQ reviewed the Application and issued a notice of deficiency and requests for supplemental information in 2024 and early 2025. Revised versions of the application were supplied to DEQ to address the deficiencies.

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The Application proposes to accept and process up to 40,000 tons/year of RMW and construct a staging area, building, and an automated conveyor system for that purpose. The RMW will be mixed with MSW and/or NHIW within the feed chutes of the three existing combustion units.

Applicants may request a variance from applicable rules as part of a permit application in accordance with OAC 252:515-3-32 and 27A O.S. § 2-10-304. In accordance with OAC 252:515-3-32(b), "Applicants requesting a variance must demonstrate that operations under the variance will equal or exceed the protection accorded by the particular rule for which the variance is being requested, and will not result in a hazard to the health, environment or safety of the people of this State or their property." The Application includes the following five variance requests: radiation interlock system, time and temperature requirements, incinerator interlocks, periodic testing, and a test demonstration. DEQ finds the Application includes the required demonstration of equal or greater protection. Radiation screening, time, temperature and testing requirements are still required but will be accomplished in a different way primarily due to unique facility design.

DEQ found the Application to be technically complete and issued the Draft Permit Modification on April 22, 2025. The notice of draft permit modification was published in *Tulsa World*, on April 30, 2025, initiating a 30-day period for public comment and opportunity to request a public meeting. A public meeting was requested and notice of date, time, and place of the public meeting was published on June 4, 2025 in *Tulsa World*. The public meeting was held at the Tulsa Public Library on July 10, 2025, at 5:30 pm. At the end of the public meeting, the public comment period was extended through July 21, 2025. DEQ received both written and oral comments during the public comment period and meeting.

Public Comments and DEQ Responses

Public comments were submitted to DEQ during the public comment period and accepted at the public meeting. Oral comments received at the public meeting have been summarized to provide clarity (Comments 1-23). Written comments submitted at the public meeting and during the public comment period include the original wording (Comments 28-69). DEQ provided responses only to comments, or parts of comments, that were found to be relevant or significant to the Tier III Permit Modification Application and Draft Permit Modification for Reworld Tulsa. All written comments and the public meeting transcript are part of the permit record and available upon request from DEQ central records

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Oral Comments Summarized from the Public Meeting.

Comment(s) received:

- 1. Several commenters raised concerns regarding the types of waste received and processed at Reworld Tulsa, including the duration Reworld Tulsa has been processing RMW and the amount.**

DEQ response: Reworld Tulsa has not previously accepted RMW at its Tulsa, Oklahoma facility. Reworld Tulsa is currently permitted to accept and process MSW and NHIW. In accordance with OAC 252:515-19-31(a), disposal of any quantity of hazardous, radioactive, or regulated polychlorinated biphenyl waste at a solid waste disposal facility is prohibited. The Application requests a permit modification to allow Reworld Tulsa to accept and process RMW.

Comment(s) received:

- 2. Several commenters raised concerns regarding air emissions emitted from Reworld Tulsa. Specifically, commenters requested additional continuous emissions monitoring, more frequent stack testing, a determination of the distance air emissions travel, and clarification on the facility's major source status. Additionally, commenters questioned whether the air emissions standards or testing requirements will change or whether a public health review will be conducted due to the addition of RMW.**

DEQ response: The solid waste regulations do not have requirements regarding air emissions standards, monitoring, or testing. Additionally, the solid waste regulations do not have requirements regarding public health reviews.

Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

- 3. Several commenters raised concerns regarding the location of Reworld Tulsa, including proximity to schools, residential areas, parks, and downtown Tulsa. Additionally, one commenter requested clarification on the reasoning behind the location selected.**

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DEQ response: Reworld Tulsa is not a new facility, and the permit boundary is not expanding; therefore, information on proximity to recreation and preservation areas is not required to be submitted as a part of the Application. The solid waste regulations do not have specific requirements regarding proximity to schools, residential areas, or downtown areas. City zoning is outside the scope of this permitting action.

Comment(s) received:

- 4. One commenter questioned if studies were conducted for endangered species habitats.**

DEQ response: Reworld Tulsa is not a new facility, and the permit boundary is not expanding; therefore, information on threatened and endangered species is not required to be submitted as part of the Application.

Comment(s) received:

- 5. One commenter requested clarification regarding incinerator ash testing requirements and where the incinerator ash is disposed.**

DEQ response: The ash is transported to a permitted solid waste landfill approved to accept NHIW. Ash is sampled annually, and the results are reported to DEQ. The ash sampling program consists of a minimum of 10 composite samples representing 10 eight-hour sampling periods. The samples are analyzed with the TCLP for the toxicity characteristic. The sampling protocol is conducted in accordance with EPA guidance on ash sampling, outlined in "Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic."

Comment(s) received:

- 6. Several commenters raised concerns regarding the effects of the ash on the water table once taken to the landfill.**

DEQ response: Once waste is completely combusted it is reduced to combustion ash, which drops via gravity off the end of the grate into the ash discharger. Until ash is transported for disposal, it is contained in an enclosed, separate building and does not come in contact with the surrounding environment. Reworld Tulsa must dispose of the ash at a permitted solid waste landfill approved to accept NHIW. MSW and NHIW landfills must comply with OAC 252:515 Subchapter 11, which requires disposal areas to be constructed with a composite liner system and a minimum 5-foot vertical separation between groundwater and the lowermost surface on which waste will be

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placed. Additionally, in accordance with OAC 252:515 Subchapter 9, landfills must conduct groundwater monitoring.

Comment(s) received:

- 7. Several commenters raised concerns regarding the number of variances and conditions in the draft permit and the variances not meeting the required criteria. Additionally, one commenter requested clarification on the number of variances a permit application may contain.**

DEQ response: In accordance with OAC 252:515-3-32(b), "Applicants requesting a variance must demonstrate that operations under the variance will equal or exceed the protection accorded by the particular rule for which the variance is being requested, and will not result in a hazard to the health, environment or safety of the people of this State or their property." The Application includes the following five variance requests: radiation interlock system, time and temperature requirements, incinerator interlocks, periodic testing, and a test demonstration. DEQ finds the Application includes the required demonstration of equal or greater protection. Radiation screening, time, temperature and testing requirements are still required but accomplished in a different way primarily due to unique facility design. Demonstrations for the variances are discussed in greater detail in the Application and draft permit.

Solid waste regulations do not limit the number of variances that can be requested. Likewise, there is no limit to the number of permit conditions specified in a permit. The number of conditions in this draft permit modification is not atypical.

Comment(s) received:

- 8. Several commenters raised concerns regarding the receipt of out-of-state waste.**

DEQ response: In accordance with OAC 252:515-19-34, DEQ issued a Permit Modification approving an out-of-state waste plan dated October 1, 2009, authorizing Reworld Tulsa to receive and process out-of-state MSW and NHIW waste streams in an excess of 200 tons/day. Each NHIW waste stream is individually approved by DEQ.

Reworld may not accept RMW from out-of-state unless it submits a permit modification to update its out-of-state waste plan.

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Comment(s) received:

- 9. One commenter asked if DEQ was looking into alternatives to process regulated medical waste outside of incineration.**

DEQ response: There are several different methods listed in OAC 252:515-23-4(a) for treating RMW, which includes incineration.

Comment(s) received

- 10. One commenter questioned if the soil around the facility is tested.**

DEQ response: Solid waste regulations do not require the soil surrounding the facility to be tested.

Comment(s) received:

- 11. Several commenters raised various concerns regarding the contract between TARE and Reworld Tulsa and how the situation was managed.**

DEQ response: The contract between TARE or the City of Tulsa and Reworld Tulsa is outside DEQ jurisdiction and the scope of this permitting action.

Comment(s) received:

- 12. Several commenters raised concerns regarding the facility being renamed Reworld Tulsa.**

DEQ response: In a letter dated March 14, 2025, DEQ approved a Notification of Name Change to change the facility name from Covanta Tulsa Renewable Energy to Reworld Tulsa, LLC. The Notification of Name Change included a Certificate of Amendment and a statement that there was no transfer of ownership or legal status as a company. In accordance with OAC 252:4-7-58(2)(A)(iv), the Notification of Name Change was considered an administrative change and approved as a Tier I Permit Modification. The solid waste regulations do not prevent a facility from changing its name.

Comment(s) received:

- 13. Several commenters raised concerns that they were not properly notified regarding the permitting action and public meeting.**

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DEQ response: In accordance with the Uniform Environmental Permitting Act, the Oklahoma statute that outlines the public participation process, this permit modification followed the Tier III process. The notice of filing was published on February 24, 2024 in the *Tulsa World*, and provided notice of a process meeting held on March 5, 2025 at the Tulsa City County Library. DEQ also sent mailers to citizens with addresses within an approximate one-mile radius of the facility to provide notification of the permitting action. At the process meeting, DEQ explained the permitting process, when oral and written comments could be submitted, and when a public meeting could be requested. A Draft Permit Modification was issued on April 22, 2025, and notice published in the *Tulsa World* on April 30, 2025, opening a 30-day public comment period and opportunity to request a public meeting. A public meeting was requested and the notice of public meeting was published on June 4, 2025 in the *Tulsa World*. The public meeting was held at the Tulsa City County Library on July 10, 2025 where DEQ accepted oral and written comments and extended the public comment period through July 21, 2025. The Application, Draft Permit Modification and associated documents have been available for review and public comment on the DEQ website and at the Tulsa County Library.

Comment(s) received:

14. One commenter raised concerns regarding the incinerator units not having sample and injection ports.

DEQ response: In accordance with OAC 252:515-3-32, "Applicants requesting a variance must demonstrate that operations under the variance will equal or exceed the protections accorded by the particular rule for which the variance is being requested, and will not result in a hazard to the health, environment or safety of the people of this State or their property."

The Application includes a variance request from the sample injection and collection ports design requirement to conduct periodic testing for commercial regulated medical waste incinerators (OAC 252:515-23-54(a)). The design of the incineration units at Reworld do not safely lend themselves to adding sample collection points where representative samples can be safely collected during operation prior to ash discharge. Reworld will conduct monthly visual inspections of ash following the processing of RMW to look for indications of incomplete combustion. If unburned RMW material or other indicators of incomplete combustion are observed during visual inspection, Reworld must follow the RMW Processing SOP which includes reprocessing of the identified material. By conducting periodic visual inspections of the ash each month following the processing of RMW, Reworld Tulsa demonstrates that complete combustion is verified. Additionally, the exhaust stacks on Reworld Tulsa's units already include sample ports for periodic air quality testing in accordance with the Title V Permit.

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The ash generated by Reworld Tulsa is required to be analyzed and results reported to DEQ. The ash sampling program consists of a minimum of 10 composite samples representing 10 eight-hour sampling periods, reported to DEQ annually. The samples are analyzed with the TCLP for the toxicity characteristic. The sampling protocol is conducted in accordance with EPA guidance on ash sampling, outlined in "Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic."

OAC 252:515-23-54(a) does not specify what kind of testing should be conducted using the sampling and collection ports. Therefore, by conducting periodic visual inspection of the ash each month following the processing of RMW and annual testing of the ash, Reworld Tulsa demonstrates that complete combustion is verified. Additionally, Reworld Tulsa's Title V Permit, issued by DEQ's Air Quality Division, contains emission limitations and monitoring and testing requirements.

Comment(s) received:

- 15. One commenter raised concerns that the temperatures at Reworld Tulsa are not high enough to destroy Prion disease.**

DEQ response: The Application provides a temperature profile study that utilizes operating data to determine the temperatures and residence times at different elevations in the units. The Application and temperature profile study detail that the temperature in the combustion zone of the grate of the units exceeds 2,500°F. The reciprocating grate will agitate the waste for a residence time of approximately 45 minutes. The flue gas will then have a retention time of 1.9 to 2.1 seconds at temperatures between 1,975°F-2,000°F. To ensure the units achieve microbial inactivation, as defined in OAC 252:515-23-2, the Application provides destruction efficiency calculations for monochlorobenzene utilizing the Thermal Stability Ranking model, the design temperature profile, and actual operating data. The Thermal Stability Ranking model predicts the destruction removal efficiency of monochlorobenzene. Monochlorobenzene was utilized in the model as it is a thermally stable principal hazardous constituent meaning it resists decomposition or significant changes when exposed to elevated temperatures. The Application and temperature profile study detail that the temperature in the combustion zone of the grate of the unit exceeds 2,500°F. The result of the model indicates that the destruction removal efficiency of monochlorobenzene is 99.9999% at a flue gas temperature of 1,974°F for a residence time of two (2) seconds.

Therefore, under normal operating conditions the temperature at the grate of 2,500°F for 45 minutes and the flue gas temperatures between 1,975°F-2,000°F for 1.9-2.1 seconds demonstrates the units are capable of achieving microbial inactivation.

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Comment(s) received:

- 16. One commenter expressed concerns about odors generated from Reworld Tulsa.**

DEQ response: The solid waste regulations do not contain requirements regarding odor.

Comment(s) received:

- 17. Several commenters expressed concerns regarding due diligence conducted by DEQ on the company's previous environmental compliance issues at other facilities.**

DEQ response: Facilities located outside of Oklahoma are outside DEQ jurisdiction and the scope of this permitting action. In accordance with OAC 252:515-7-15(b)(1), a permit or permit modification cannot be issued if the applicant is not in substantial compliance with the Oklahoma Environmental Quality Code, DEQ rules, and the terms of any existing permits or orders. Reworld Tulsa is currently in substantial compliance and has met all requirements in accordance with applicable solid waste regulations to properly manage regulated medical waste.

Comment(s) received:

- 18. One commenter raised concerns regarding plastics in the RMW stream, such as petri dishes and IV tubes. The commenter indicated that RMW would have far more plastic than MSW due to the recycling of plastics, diverting them from the MSW stream.**

DEQ response: The solid waste regulations do not limit or prevent plastics from being incinerated.

Comment(s) received:

- 19. One commenter raised concerns that Reworld Tulsa is owned by a holding corporation based out of Bermuda.**

DEQ response: DEQ regulations do not have requirements regarding where ownership of a company is based.

Comment(s) received:

- 20. One commenter stated that rigorous and ongoing testing should be required, not just for basic compliance, but for all potential toxins associated with solid waste handling.**

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DEQ response: The ash generated by Reworld Tulsa is sampled annually and the results reported to DEQ. The ash sampling program consists of a minimum of 10 composite samples representing 10 eight-hour sampling periods. The samples are analyzed with the TCLP. The sampling protocol is conducted in accordance with EPA guidance on ash sampling, outlined in "Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic."

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

- 21. One commenter stated that they had concerns regarding self-reporting without external validation, pre-scheduled testing dates that allow incinerators to adjust operations to skew results, and annual-only testing.**

DEQ response: As stated in a previous response, Reworld Tulsa is required to conduct annual ash sampling in accordance with EPA guidance on ash sampling, outlined in "Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic." Solid waste does not have regulations that prevent self-reporting.

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

- 22. One commenter stated that test data should be posted to a publicly available website.**

DEQ response: For any document submitted to or issued by DEQ, records may be requested at any time through DEQ's Central Records office. See <https://oklahoma.gov/deq/about/asd/records.html>.

Comment(s) received:

- 23. Electricity is generated at Reworld Tulsa through a waste-to-energy process, where waste is combusted at high temperatures to create steam and fuel. One commenter questioned where the generated electricity goes.**

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DEQ Response: DEQ does not regulate the distribution of electricity.

Written Comments Received.

Comment(s) received:

24. "Incinerating regulated medical waste (RMW), which contains lots of plastics, is dangerous due to the release of harmful air pollutants, particularly dioxins, which have been linked to cancer and other health problems. These incinerators also release mercury, and other toxins, posing risks to both human health and the environment. Our Municipal Solid Waste in our grey containers has little plastic because we recycle our plastics in the blue container."

DEQ Response: The solid waste regulations do not limit or prevent plastics from being incinerated.

Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

25. "Incinerating Reworld/Covanta contends, "Aside from the infectious aspect, of the waste components and characteristics of RMW are very similar to that of MSW." Regulated medical waste (RMW) and Municipal Solid Waste (MSW) is permitted at Covanta's Marion County facility located in Brooks, Oregon. (Quote from Appendix N Air Emissions, Covanta-Application-Vol-5). According to Covanta, "An analysis of emissions at the Marion County facility has found no statistically significant relationship between RMW processing rates and emissions concentrations." But when the state of Oregon under Senate bill 488 required continuous emissions monitoring for fifteen substances from the smokestacks, Covanta did not."
26. "Reworld/Covanta Tulsa only monitors continuously. four substances, Carbon Monoxide, Nitrogen Oxides, Sulfur Oxides, and Opacity. Reward/Covanta does not monitor eleven other substances except once per year, PM10, PM 2.5, Volatile Organic Compounds, Lead, Dioxin, Beryllium, Cadmium, Fluorine expressed as Fluoride, Hydrochloric acid, Mercury, and Sulfuric acid."

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DEQ Response: Facilities located outside of Oklahoma are outside of DEQ jurisdiction and the scope of this permitting action. Additionally, the solid waste regulations do not have requirements regarding air emissions.

Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

- 27. "The Tulsa City Council must require continuous emissions monitoring by Covanta. By doing continuous emissions monitoring that is the only way we will know what is coming out of those smokestacks."**
- 28. "Stack testing is like pulling your speedometer out of your car 364 days out of the year, but on that final day, day 365, you must install your speedometer because you will be going through a speed trap. 364 days out of the year we have no direct data on those eleven other substances that are measured only once per year. And again, when the state of Oregon under Senate bill 488 required continuous emissions monitoring for fifteen substances from the smokestacks, Covanta did not comply, and the Covanta Marion incinerator is scheduled to close on January 1st, 2025."**
- 29. "I am a 27 year old resident of Tulsa. I live in Riverview, directly across the river from Reworld. I want to be able to breathe clean air. Please hold these large polluters accountable and continuously monitor emissions for all 15 air toxins. Data collection is the only way that we can ensure that the people of Tulsa are breathing clean air. Living in Oklahoma we have wide open spaces. We can't justify breathing polluted air in a place like this. This is the planet and environment that I will raise kids in, please help to keep it clean for future generations. The power is in your hands."**
- 30. "I have serious concerns about the "minor" change requested to allow regulated medical waste to be burned. As a governmental agency that is based on science, I would hope that evidence of the projected effects on public health in the form of peer reviewed scientific studies will be presented to the public."**

DEQ response: The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

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Comment(s) received:

31. "Testing- OAC 252: 515- 23-54 (a) Routine periodic testing. The incinerators design must provide sample injection and collection ports to enable the owner/operator or the DEQ to conduct periodic tests. Reworld/Covanta is asking for a variance to circumvent rule OAC 252: 515-23-54(a). The rule states MUST, there is no other option. DEQ needs easy access to monitoring. The DEQ states, "Reworld Tulsa is already subject to emission monitoring under its Oklahoma DEQ Air Quality Permit. Additionally, Reworld Tulsa will conduct monthly visual inspections of the ash following processing of regulated medical waste to look for indications of incomplete combustion. I believe DEQ's rationale is flawed, since Reworld/Covanta does not continuously monitor all fifteen substances the DEQ must have these injection and collection ports in place to ensure compliance, this is a must in DEQ's own language. Sample injection and collection ports are crucial for the Oklahoma Department of Environmental Quality (DEQ) when regulated medical waste is incinerated because they enable the DEQ to monitor the incinerator's performance and ensure its operating according to environmental regulations. If the DEQ fails with this compliance rule it will be complicit in following its own regulations. It will also create a potential public health risk. This is not acceptable. I oppose DEQ giving Reworld/Covanta a variance to circumvent rule OAC 252:515-23- 54 (a)."

DEQ response: In accordance with OAC 252:515-3-32, "Applicants requesting a variance must demonstrate that operations under the variance will equal or exceed the protections accorded by the particular rule for which the variance is being requested, and will not result in a hazard to the health, environment or safety of the people of this State or their property." An application may include a variance request to vary from specific rules if a demonstration showing that what is proposed is equally or more protective than the rule.

The Application includes a variance request from the sample injection and collection ports design requirement to conduct periodic testing for commercial regulated medical waste incinerators (OAC 252:515-23-54(a)). The design of the incineration units at Reworld do not safely lend themselves to adding sample collection points where representative samples can be safely collected during operation prior to ash discharge. However, the exhaust stacks on Reworld's units already include sample ports for periodic air quality testing in accordance with the Title V Permit. Additionally, Reworld will conduct monthly visual inspections of ash following the processing of RMW to look for indications of incomplete combustion. If unburned RMW material or other indicators of incomplete combustion are observed during visual inspection, Reworld must follow the RMW Processing SOP which includes reprocessing of the identified material. By conducting periodic visual inspections of the ash each month following the processing of RMW, Reworld Tulsa demonstrates that complete combustion is verified.

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OAC 252:515-23-54(a) does not specify what kind of testing should be conducted using the sampling and collection ports. Therefore, by conducting periodic visual inspection of the ash each month following the processing of RMW and annual testing of the ash, Reworld Tulsa demonstrates that complete combustion is verified. Additionally, Reworld Tulsa's Title V Permit, issued by DEQ's Air Quality Division, contains emission limitations and monitoring and testing requirements. Analysis of the ash and visual inspections ensure the ash going to an approved landfill is appropriate for disposal.

Comment(s) received:

- 32. "Kicking around in the ash to check for incomplete combustion is hardly a scientific method for determining incomplete combustion after the fact that emissions have already been released."**

DEQ response: The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

As stated in a previous response, Reworld Tulsa is required to conduct annual ash sampling in accordance with EPA guidance on ash sampling, outlined in "Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic."

Comment(s) received:

- 33. "Testing; OAC 252:515-23-54(b) 'Demonstration, prior to operation, the owner/operator must conduct a demonstration showing complete destruction of a chemical which requires 2000° F for destruction, and which is introduced into the unit under normal operating procedures.' Again, this quote is a rule from DEQ Not an option, which can be ignored, placing the public at potential health risk."**

DEQ response: In accordance with OAC 252:515-3-32, "Applicants requesting a variance must demonstrate that operations under the variance will equal or exceed the protections accorded by the particular rule for which the variance is being requested, and will not result in a hazard to the health, environment or safety of the people of this State or their property." The design of the incineration units at Reworld do not lend themselves to adding sample collection points where representative samples can be safely collected during operation prior to ash discharge. The Application provides destruction efficiency calculations for monochlorobenzene utilizing the Thermal Stability Ranking model, the design temperature profile, and actual operating data. The

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Thermal Stability Ranking model predicts the destruction removal efficiency of monochlorobenzene. Monochlorobenzene was utilized in the model as it is a thermally stable principal hazardous constituent meaning it resists decomposition or significant changes when exposed to elevated temperatures. The Application and temperature profile study detail that the temperature in the combustion zone of the grate of the unit exceeds 2,500°F. The result of the model indicates that the destruction removal efficiency of monochlorobenzene is 99.9999% at a flue gas temperature of 1,974°F for a residence time of two (2) seconds. Furthermore, under normal operating conditions, the waste will be exposed to 2,500°F for a portion of its approximate 45-minute duration on the grate in addition to the elevated flue gas temperatures in the upper furnace.

Comment(s) received:

- 34. “2000° F is important in the destruction of dioxin, a known carcinogen. Reworld/Covanta does not do continuous emissions monitoring on all fifteen substances. Dioxin is one of those substances that they measure only once per year in what is called a stack test.”**

DEQ response: The Application provides a temperature profile study that utilizes operating data to determine the temperature and residence times at different elevations in the unit. The Application and temperature profile study detail that the temperature in the combustion zone of the grate of the unit exceeds 2,500°F. The reciprocating grate will agitate the waste for a residence time of approximately 45 minutes. The flue gas will then have a retention time of 1.9 to 2.1 seconds at temperatures between 1,975°F-2,000°F.

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

- 35. “Covanta touts itself as a Municipal Waste Combustor but appears it wants to be an Industrial and Medical Waste Combustor as shown in the contract between the TARE board (Tulsa Authority for the Recovery of Energy) and Covanta. Covanta is seeking to use 60% of its combustion capacity to burn Industrial Garbage (Special Waste) and Regulated Medical Waste.”**
- 36. “TARE represents to Covanta that TARE is duly organized and existing in good standing under the laws of the State and is duly qualified and authorized to carry out its functions and operations as contemplated by this Agreement. Support for**

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Covanta's ODEQ Permit for Profiled Waste. Conditioned upon Covanta's diligent and good-faith prosecution of an application to expand its ODEQ permit(s) to include greater authorization to accept Special Waste (to include Regulated Medical Waste) at the Recovery Facility and to accelerate the approval of such permit(s), subject to the capacity guarantee prescribed herein, TARE will affirmatively and actively support and advocate for Covanta's application and other state or federal environmental, energy or climate policy that could affect the Recovery Facility." These are excerpts out of the contract received through the Open Records Act. Lack of disclosure to the public: The public has not been made aware of the details of the contract. The contract shows that this has been hushed up. "No party (or any agent or affiliate of a party) shall make any public statements, including, without limitation, any press releases, with respect to this Agreement and the transactions contemplated hereby, except as may be required by law or with the written permission of the other party." This is an excerpt from the contract received through the Open Records Act."

37. **"The proposed contract expansion between this facility and TARE—allowing the import of unclassified medical waste from multiple states—raises serious concerns, particularly given the lack of adequate public notification or engagement. The facility operates with minimal oversight, conducting only four basic emissions tests per year and lacking real-time or continuous monitoring of incinerated materials. The private equity firm that now owns the plant has a troubling history of environmental violations and has been barred from operating in other jurisdictions. This facility was originally a publicly subsidized, non-profit waste-to-energy plant that TARE could not run independently. Now, it's being used for profit at the expense of public safety—just two miles from downtown Tulsa. Granting a waiver or variance to allow out-of-state, ungraded medical waste without thorough public input and without significantly improved monitoring would be irresponsible. The risk to community health is too great to ignore."**

DEQ response: The contract between TARE or the City of Tulsa and Reworld Tulsa is outside of DEQ jurisdiction and the scope of this permitting action. Reworld Tulsa is currently permitted to accept MSW and NHIW. The Application proposes to accept and process up to 40,000 tons/year of RMW.

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

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Facilities located outside of Oklahoma are outside of DEQ jurisdiction and the scope of this permitting action. In accordance with OAC 252:515-7-15(b)(1), a permit or permit modification cannot be issued if the applicant is not in substantial compliance with the Oklahoma Environmental Quality Code, DEQ rules, and the terms of any existing permits or orders. Reworld Tulsa is currently in substantial compliance and has met all requirements in accordance with applicable solid waste regulations to properly manage regulated medical waste.

In accordance with the Uniform Environmental Permitting Act, the Oklahoma statute that outlines the public participation process, this permit modification followed the Tier III process. The notice of filing was published on February 24, 2024, in the *Tulsa World*, and provided notice of a process meeting held on March 5, 2025, at the Tulsa City County Library. DEQ also sent mailers to citizens with addresses within an approximate one-mile radius of the facility to provide notification of the permitting action. At the process meeting, DEQ explained the permitting process, when oral and written comments could be submitted, and when a public meeting could be requested. A Draft Permit Modification was issued on April 22, 2025, and notice published in the *Tulsa World* on April 30, 2025, opening a 30-day public comment period and opportunity to request a public meeting. A public meeting was requested, and the notice of public meeting was published on June 4, 2025, in the *Tulsa World*. The public meeting was held at the Tulsa City County Library on July 10, 2025, where DEQ accepted oral and written comments and extended the public comment period through July 21, 2025. The Application, Draft Permit Modification and associated documents have been available for review and public comment on the DEQ website and at the Tulsa County Library

Comment(s) received:

- 38. "I strongly oppose the request for a variance or waiver allowing importation of ungraded medical waste to the Tulsa incinerator. This posts a health risk and lacks the public input."**
- 39. "I strongly oppose the request for a variance or waiver allowing importation of ungraded medical waste to the Tulsa incinerator. This posts a health risk and lacks the public support. After researching the company requesting the waiver, it looks like their practices are questionable. It appears that they are banned from operating in the State of Oregon. Tulsa deserves better."**
- 40. "I am opposed to giving Reworld/Covanta a variance to burn Regulated Medical Waste."**

DEQ Response: In accordance with OAC 252:515-3-32, the Application includes five variance requests from the following: radiation interlock system, time and temperature, interlocks, periodic

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testing, and a test demonstration. DEQ finds the Application includes the required demonstration of equal or greater protection required for variance approval. Radiation screening, time, temperature and testing considerations are still required but accomplished in a different way primarily due to unique facility design. Permit Modification conditions are included to ensure RMW is properly managed.

In accordance with the Uniform Environmental Permitting Act, the Oklahoma statute that outlines the public participation process, this permit modification followed the Tier III process. The notice of filing was published on February 24, 2024 in the *Tulsa World*, and provided notice of a process meeting held on March 5, 2025 at the Tulsa City County Library. DEQ also sent mailers to citizens with addresses within an approximate one-mile radius of the facility to provide notification of the permitting action. At the process meeting, DEQ explained the permitting process, when oral and written comments could be submitted, and when a public meeting could be requested. A Draft Permit Modification was issued on April 22, 2025, and notice published in the *Tulsa World* on April 30, 2025, opening a 30-day public comment period and opportunity to request a public meeting. A public meeting was requested and the notice of public meeting was published on June 4, 2025 in the *Tulsa World*. The public meeting was held at the Tulsa City County Library on July 10, 2025 where DEQ accepted oral and written comments and extended the public comment period through July 21, 2025. The Application, Draft Permit Modification and associated documents have been available for review and public comment on the DEQ website and at the Tulsa County Library

Facilities located outside of Oklahoma are outside of DEQ jurisdiction and the scope of this permitting action.

Comment(s) received:

41. **"I am very concerned about this new medical waste entering our community. Because of lax regulations in Oklahoma using the RCRA Permit tool, I do not want any more threats to the health of our future generations living in Tulsa. What happened to the Covanta Trash to Energy Incinerator? When did it become ReWorld? We will add to our already poor air quality in Tulsa, including Ozone Days, and we are being pushed to accept something that is already here. I think you have the cart before the horse. I would like to see Tulsa leaders make a concerted effort to stop attracting more industry that increases threats to clean air, clean water and clean soil. We must have these three elements to have a healthy community. What are you doing to protect and restore us to a healthy community? Adding parks is lovely, but it does not clean up our air, clean up our rivers nor restore healthy soils. You will be adding to the toxic exposures of emissions to our families, loved ones and friends. If the Clean Water Act is diminished by our national leadership, will you continue to operate with the current regulations or will you immediately drop your protective environmental**

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initiatives? Because of the public health threats, inevitable environmental contamination, occupational hazards, harm to our native wildlife and financial risks to our community, I vote no to the addition of medical waste brought from outside the city into our community to be disposed.”

DEQ response: In a letter dated March 14, 2025, DEQ approved a Notification of Name Change to change the facility name from Covanta to Reworld Tulsa, LLC. The notification included a Certificate of Amendment and a statement that there was no transfer of ownership or legal status as a company. In accordance with OAC 252:4-7-58(2)(A)(iv), the Notification of Name Change was considered an administrative change and approved as a Tier I Permit Modification. The solid waste regulations do not prevent a facility from changing its name.

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action. The Clean Water act is outside of the scope of this permitting action.

Comment(s) received:

- 42. “I am submitting written comments in opposition to granting a Tier III application and Draft Solid Waste Permit Modification to Covanta and the Reworld Tulsa facility. Covanta is seeking a variance that will allow it to incinerate special waste and regulated medical waste at the Reworld Tulsa facility. First I oppose granting the application and permit modification in general because we should not encourage or allow any business in the Tulsa area to further diminish the valuable air quality in Tulsa and reduce the quality of life in Tulsa that we all have fought to try to keep at a high level. Second, I oppose granting the application and permit modification in particular because of the close proximity of the Reworld Tulsa facility to an elementary school, several residential neighborhoods (including prestigious and historic homes as well as low income housing), and several public parks. There isn't and reasonable or beneficial justification for allowing Covanta to pour the toxic byproduct of incinerating special waste and regulated medical waste into the atmosphere close to these areas.”**

DEQ response: Reworld Tulsa is currently permitted to accept MSW and NHIW. The Application proposes to accept and process up to 40,000 tons/year of RMW.

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring

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and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Reworld Tulsa is not a new facility, and the permit boundary is not expanding; therefore, information on proximity to recreation and preservation areas is not required to be submitted as a part of the Application. Solid waste regulations do not have specific requirements regarding proximity to schools or residential areas. City zoning is outside the scope of this permitting action.

Comment(s) received:

43. "We are writing about the proposed permit modification for Reworld Tulsa's Thermomechanical Treatment Facility (TTF) that would allow the facility to accept and process some regulated medical waste (RMW) within its current permitted capacity. Located in Tulsa, the Reworld facility has served as a waste-to-energy site, processing over 280,000 tons of waste annually that would otherwise be landfilled. The proposed modification would allow for up to 40,000 tons per year of non-hazardous RMW to be disposed of using high-temperature, automated systems designed to minimize risk to employees and the public. The materials to be processed would include items such as surgical gloves, dialysis tubes, used bandages, small vials of blood and expired vaccines. Reworld has stated that additional quality control, transport protocols, and air pollution controls would be used to handle these materials. We are aware that ODEQ has issued an air permit for this project that would not increase air emissions from the facility. We understand that Reworld has processed the same type of material for over 30 years at facilities in Oregon, Florida, and Alabama. We have no concerns with the proposed permit change. We appreciate the opportunity to stay informed about proposed changes."
44. "I am writing in support of the proposed change to Reworld Tulsa's Thermomechanical Treatment Facility (TTF). This change would let the facility accept and handle certain types of RMW without going over its current allowed limit. We do not have any concerns about this permit change and thank you for keeping us updated."
45. "We are writing about the proposed change to Reworld Tulsa's Thermomechanical Treatment Facility (TTF). This change would let the facility accept and handle certain types of regulated medical waste (RMW) without going over its current allowed limit. The Reworld facility, located in Tulsa, turns waste into energy. Every year, it processes over 280,000 tons of waste that would otherwise go to a landfill. With this change, the facility could take in up to 40,000 tons of non-hazardous medical waste each year. This waste would be handled using high-heat systems designed to be safe for workers and the public. The types of medical waste include things like

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surgical gloves , dialysis tubes , used bandages , small blood vials , and expired vaccines. Reworld has said it will use extra safety checks , careful transport steps , and air pollution controls to manage this waste. We are aware that the Oklahoma DEQ has already given the project an air permit, and it will not lead to more pollution. We also know that Reworld has safely handled this type of waste for more than 30 years at its locations in Oregon, Florida, and Alabama. We do not have any concerns about this permit change and thank you for keeping us updated.”

DEQ response: Facilities located outside of Oklahoma are outside DEQ jurisdiction and the scope of this permitting action. Other information in these comments is consistent with information provided in the application.

Comment(s) received:

46. “Why in your job description can you not protect our air, water & land for our communities? This REWORLD company is getting fined in almost every state that they are in. Primarily for not keeping accurate records and falsifying data. They are also being fined for non-complying!!! They have pretty marketing things and websites but their information does not expose their truths. Nor do the facts. Medical waste disposal is very risky particularly for ODEQ who already can't keep up with facts, fines and citizen reporting. Our communities do not want this company burning medical wastes or anything else for that matter. Send them somewhere else! The citizens of Tulsa are already breathing filthy chemical contaminants because of your organization inadequate attempts to protect us. Do your jobs! Don't issue permits of any kind for this company. It has a horrible history and we don't want them here!”

DEQ response: Facilities located outside of Oklahoma are outside DEQ jurisdiction and the scope of this permitting action. In accordance with OAC 252:515-7-15(b)(1), a permit or permit modification cannot be issued if the applicant is not in substantial compliance with the Oklahoma Environmental Quality Code, DEQ rules, and the terms of any existing permits or orders

Comment(s) received:

47. “I am against burning medical waste from other states. CONTINUOUS MONITORING OF ALL WASTE BURNED AT REWORLD TULSA! Want daily online reporting on waste monitoring for all hazardous air toxins.”

DEQ response: The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission

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limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

- 48. "I believe we need a Public Meeting. We need to have people from the medical community as well as engineers and others. Our residents of Tulsa County needs to know what REWORLD is asking for in this permit. It is not clear in the Draft Permit and a lot of pertinent data is missing! Your data in this permit is incomplete and based on the record keeping of HFSinclair, you need to hear from our community and maybe you will listen to what we are saying! STOP turning Tulsa into a more toxic city!"**

DEQ response: A public meeting was held on July 10, 2025 at Tulsa City County Library. In accordance with the Uniform Permitting Act, the notice of the public meeting was published on June 4, 2025. The Application, Draft Permit Modification and associated documents have been available for review and public comment on the DEQ website and the Tulsa County Library during the comment period.

The draft permit modification outlines the request to modify Reworld Tulsa's existing solid waste permit to allow for the acceptance of regulated medical waste ("RMW") and modifications to the facility to support RMW processing.

Comment(s) received:

- 49. "Because the draft permit on the ODEQ public notice webpage does not contain the Public hearing date/time information for this permit modification, people haven't been given adequate notice that they are able to attend or even understand that this draft permit and hearing are about the same thing. Taxpayers should be duly notified about ODEQ's public hearings and able to easily understand that the hearing and the draft permit modification on the webpage are about the same thing. Out of an abundance of caution and with respect for due process, I respectfully request that ODEQ extend the comment period and hold another public hearing so that the public is able to fully participate."**

DEQ response: The Application, Draft Permit Modification and associated documents, including the notice of public meeting, have been available for review on the DEQ website.

In accordance with the Uniform Environmental Permitting Act, the Oklahoma statute that outlines the public participation process, this permit modification followed the Tier III process. The notice

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of filing was published on February 24, 2024 in *Tulsa World*, and provided notice of a process meeting held on March 5, 2025 at the Tulsa City County Library as well as where the Application could be found for public review. At the process meeting, DEQ explained the permitting process and when oral and written comments may be received. A Draft Permit Modification was issued on April 22, 2025, and notice published in the *Tulsa World* on April 30, 2025. A public meeting was requested and notice of the public meeting was published on June 4, 2025 in *Tulsa World*. DEQ sent mailers to citizens within a one mile radius of the facility to provide notification of the permitting action. The Application, Draft Permit Modification, and associated documents have been available for review and public comment on the DEQ website and at the Tulsa County Library during the comment period. Additionally, the public comment period was extended through July 21, 2025.

DEQ acknowledges notice of public meetings are not located on the public comment page and is working to address changes to the DEQ website so that information about public meetings is easy to find.

Comment(s) received:

- 50. "I implore this agency to deny the permit modification because there is no assurance than can be had for parents of children living or going to school within a stone's throw from the facility. There is no assurance that people exposed to Reworld's current and If ODEQ has to grant 5 variances with 17 conditions, why not require a new facility to be built? Are these variances granted to mitigate hardships? Did Reworld show proof of these hardship? Please do not sacrifice our children for the greed and avarice of industry. Please extend the comment period for another 30 days."**

DEQ response: Reworld Tulsa is not a new facility, and the permit boundary is not expanding; therefore, information on proximity to recreation and preservation areas is not required to be submitted as a part of the Application. Solid waste regulations do not have specific requirements regarding residential areas. City zoning is outside the scope of this permitting action.

In accordance with OAC 252:515-3-32(b), "Applicants requesting a variance must demonstrate that operations under the variance will equal or exceed the protection accorded by the particular rule for which the variance is being requested, and will not result in a hazard to the health, environment or safety of the people of this State or their property." The Application includes the following five variance requests: radiation interlock system, time and temperature requirements, incinerator interlocks, periodic testing, and a test demonstration. DEQ finds the Application includes the required demonstration of equal or greater protection. Radiation screening, time, temperature and testing requirements are still required but accomplished in a different way primarily due to unique facility design.

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Solid waste regulations do not limit the number of variances that can be requested. Likewise, there is no limit to the number of permit conditions specified in a permit. The number of conditions in this draft permit modification is not atypical.

Comment(s) received:

51. **"After hearing the presentation on Coventa/ReWorld's request to expand their permit to include Special Waste including Regulated Medical Waste at their Tulsa facility, I request that the permit be denied. The facility is old & not equipped to meet today's emissions standards for new or modified facilities. And research on their other facilities shows they have a poor track record for testing & compliance with environmental standards. This is simply too big a risk to the health of our citizens, especially those living in close proximity to their facility. And the fact that the Agreement & Coventa specifically prohibits any publicity regarding the Agreement and transactions contemplated pretty much says it all. To purposely hide a proposed change of this magnitude is a disgrace and disservice to the citizens of Tulsa. I urge you to deny this permit as well as the upcoming one for air quality."**

DEQ response: Reworld Tulsa is currently permitted to accept MSW and NHIW. The Application proposes to accept and process up to 40,000 tons/year of RMW.

DEQ does not have jurisdiction over facilities located outside of Oklahoma. The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

DEQ has no Agreement with Reworld as referenced in the comment and assumes the comment is referring to the agreement with TARE. The contract between TARE or the City of Tulsa and Reworld Tulsa is outside DEQ jurisdiction and the scope of this permitting action.

In accordance with the Uniform Environmental Permitting Act, the Oklahoma statute that outlines the public participation process, this permit modification followed the Tier III process. The notice of filing was published on February 24, 2024 in the *Tulsa World*, and provided notice of a process meeting held on March 5, 2025 at the Tulsa City County Library. DEQ also sent mailers to citizens with addresses within an approximate one-mile radius of the facility to provide notification of the permitting action. At the process meeting, DEQ explained the permitting process, when oral and written comments could be submitted, and when a public meeting could be requested. A Draft Permit Modification was issued on April 22, 2025, and notice published in the *Tulsa World* on

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April 30, 2025, opening a 30-day public comment period and opportunity to request a public meeting. A public meeting was requested and the notice of public meeting was published on June 4, 2025 in the *Tulsa World*. The public meeting was held at the Tulsa City County Library on July 10, 2025 where DEQ accepted oral and written comments and extended the public comment period through July 21, 2025. The Application, Draft Permit Modification and associated documents have been available for review and public comment on the DEQ website and at the Tulsa County Library

Comment(s) received:

- 52. "How is the emission will be monitored? Under the current permit, what equipment is used to monitor Toxic emissions. Stack testing completed every year? and does the facility submit annual reports for GHG. Under the current permit the facility has had any "incidents in the past? Almost all industrial facilities, have downtime for boilers, does the facility have other type of fuel in Storage. RepWorld has been take medical waste in other Facilities in FL, are there any plans to conduct trail burns? Where is ash will be disposed of in landfill would the ash be tested for heavy metals? Lastly what are the chances that the facility will be changing the permit in the future to go under Synthetic minor?"**

DEQ Response: The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

As stated in a previous response, Reworld Tulsa is required to conduct annual ash sampling in accordance with EPA guidance on ash sampling, outlined in "Guidance for the Sampling and Analysis of Municipal Waste Combustion Ash for the Toxicity Characteristic."

Comment(s) received:

- 53. "Reworld/Covanta is located at W 21st St. and Yukon. This location is 1.5 miles from Downtown Tulsa, six blocks from Eugene Field Elementary School, two miles from The Gathering Place, 1.5 miles from 21st and Riverside Drive, two miles from the historic homes of Maple Ridge, and Aeon is within two blocks of this incinerator with 2700 employees. This is not a location to allow a more toxic waste stream in our community."**

DEQ Response: Reworld Tulsa is not a new facility, and the permit boundary is not expanding; therefore, information on proximity to recreation and preservation areas is not required to be submitted as a part of the Application. Solid waste regulations do not have specific

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requirements regarding residential areas. City zoning is outside the scope of this permitting action.

Comment(s) received:

54. **"Burning medical waste would be disastrous and neglectful to the health of the 400k+ people living in Tulsa. We do not want cancer and we do not want health complications."**
55. **"I oppose burning regulated medical waste in Tulsa, as I am concerned about the risk to air quality and public health for Tulsans."**
56. **"It's already bad enough that we have a refinery in town polluting the city's air. Please, we do not need to be burning ungraded medical waste too. We have over 433K people that live, work, and play ere. Let's protect all of us."**
57. **It has been my experience talking to everyday people on the street that no one finds it acceptable to burn Biohazardous Regulated Medical Waste for Oklahoma and its six neighboring states.**
58. **"Please do not burn medical waste from some out of state company so close to downtown. This is a disastrous proposal for public health. If you want to invest in your citizens you will deny this permit."**
59. **"Please don't burn medical waste on the river! Or anywhere! In Tulsa!"**
60. **"I don't want this for our future"**

DEQ Response: Reworld Tulsa is currently in substantial compliance and has met all requirements in accordance with applicable solid waste regulations to manage regulated medical waste.

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

61. **"STOP POLLUTING OUR CITY!!!!!! NO MORE!!!! How are we going to have things like "Tulsa Remote" to attract people to our city while POLLUTING IT and**

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it smells AWFUL!!!!!! If you haven't driven across riverside recently, maybe you should, it smells LIKE *[expletive removed]*!!! Literally like sewage. NO MORE POLLUTING TULSA!!!! We will never attract people to our city while putting awful things in the air and not caring about the effects on our people or the environment!!!! NO!!!!!!”

62. “NO!!!!!!!!!! STOP POLLUTING OKLAHOMA STOP POLLUTING TULSA!!!!!! i'm not sure if any of yall have ever driven across the river but it SMELLS BAD!!! how are we gonna have a tulsa remote program trying to attract people to our city while also TURNING INTO *[expletive removed]*!!!! It literally smells LIKE SEWAGE!!!!”

63. “NO!!!!!!!!!! STOP POLLUTING OKLAHOMA STOP POLLUTING TULSA!!!!!! i'm not sure if any of yall have ever driven across the river but it SMELLS BAD!!! how are we gonna have a tulsa remote program trying to attract people to our city while also TURNING INTO *[expletive removed]*!!!! It literally smells LIKE SEWAGE!!!! Stop polluting our city!!!! no more!!!”

DEQ Response: The above are comments received to which a response could not be formulated due to their context; therefore, they are noted as received.

Comment(s) received:

64. “I only learned about the permit that Reworld is seeking to incinerate medical waste. I live at University Club Tower and do not want for myself, my family, my community, and all of the people of this beautiful city to breathe the toxins that will be emitted from this facility. From the data that Mr. Ricky Johnson presented at the Tulsa Library on Denver on Thursday July 10th, the level of toxins expected from the facility will be about 72% greater than was expected from the municipal waste. This is unacceptable and very unsettling to think of the potential disease and health problems this will create for our community. This permit should be put to a vote by the citizens of Tulsa County and all surrounding counties.”

DEQ Response: The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action. DEQ cannot verify the accuracy of documentation not provided by Reworld Tulsa or DEQ.

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The Uniform Permitting Act sets out public participation requirements for applicants seeking a permit or permit modification from DEQ. The Uniform Permitting Act does not require applicants to seek a citizen vote as part of the public participation process.

Comment(s) received:

65. **"I strongly urge the DEQ to deny the waiver request allowing out-of-state medical waste to be transported to and incinerated in Tulsa. This proposal poses serious health and environmental risks to our community, and it is deeply concerning that there has been minimal public notice or opportunity for meaningful public input on a decision of this magnitude. Incinerating medical waste releases harmful pollutants, including dioxins, mercury, and particulate matter, all of which are linked to respiratory problems, cancer, and other long-term health impacts. This is especially troubling given the incinerator's proximity (approximately two miles) from OSU Medical Center and Select Specialty Hospital, both of which serve some of Tulsa' most vulnerable patients, including those with compromised immune systems, chronic illnesses, and limited access to resources. It is unacceptable to introduce additional health burdens to a population already at risk. Tulsa should not become a dumping ground for out-of-state hazardous waste, particularly when the decision process has lacked transparency and adequate public engagement. Our community deserves a voice in decisions that directly affect our health, air quality, and future. Please do not approve this waiver. The health and safety of our community, especially our most vulnerable, must come first."**

DEQ response: In accordance with the Uniform Environmental Permitting Act, the Oklahoma statute that outlines the public participation process, this permit modification followed the Tier III process. The notice of filing was published on February 24, 2024, in the *Tulsa World*, and provided notice of a process meeting held on March 5, 2025, at the Tulsa City County Library. DEQ also sent mailers to citizens with addresses within an approximate one-mile radius of the facility to provide notification of the permitting action. At the process meeting, DEQ explained the permitting process, when oral and written comments could be submitted, and when a public meeting could be requested. A Draft Permit Modification was issued on April 22, 2025, and notice published in the *Tulsa World* on April 30, 2025, opening a 30-day public comment period and opportunity to request a public meeting. A public meeting was requested, and the notice of public meeting was published on June 4, 2025, in the *Tulsa World*. The public meeting was held at the Tulsa City County Library on July 10, 2025, where DEQ accepted oral and written comments and extended the public comment period through July 21, 2025. The Application, Draft Permit Modification and associated documents have been available for review and public comment on the DEQ website and at the Tulsa County Library.

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In accordance with OAC 252:515-19-34, DEQ issued a Permit Modification approving an out-of-state waste plan dated October 1, 2009, authorizing Reworld Tulsa to receive and process out-of-state NHIW waste streams in an excess of 200 tons/day. Each NHIW waste stream is individually approved by DEQ. Reworld may not accept RMW from out-of-state unless it submits a permit modification to update its out-of-state waste plan.

The solid waste regulations do not have requirements regarding air emissions. Reworld Tulsa's Title V Permit issued by DEQ's Air Quality Division contains emission limitations and monitoring and testing requirements. Reworld Tulsa's Air Quality Permit and compliance with Air Quality regulations is outside the scope of this permitting action.

Comment(s) received:

- 66. "This permit proposal raises serious concerns: it lacks rigorous safeguards for air and water quality, offers minimal buffer zones between the facility and nearby homes, and undervalues community health impacts. Notably, other states have rejected or heavily restricted this type of waste for a reason-because it poses real risks. Importing it into Oklahoma without strict controls and oversight turns our communities into dumping grounds. We deserve stronger protections and full transparency before moving forward."**

DEQ response: Facilities located outside of Oklahoma are outside of DEQ jurisdiction and the scope of this permitting action. Air and water quality are outside the scope of this permitting action.

The solid waste regulations do not have specific requirements regarding proximity to schools, residential areas, or downtown areas. City zoning is outside the scope of this permitting action.

Comment(s) received:

- 67. "I strongly oppose the request for a variance or waiver allowing importation of ungraded medical waste to the Tulsa incinerator. Why should we allow other states to send their toxic materials here for disposal to the detriment of the health of those who live in Tulsa? Sending toxic materials from richer areas of the country (where citizens have more resources to protest) to Tulsa, is just a 21st century example of environmental injustice. The incinerator in question is just two miles from downtown. This poses a serious health risk and lacks public input. The company in question, Covanta (d/b/a "Reworld"), has a poor track record of maintaining environmental safety. It is also significantly a foreign-owned enterprise, with more than half billion in revenue just last year. I do not dispute that Tulsa needs more and varied business investment and activity. But allowing our environment to be**

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the dumping ground for other state's forever chemicals, is not the way forward. Please let me know if any public forums are being held in Tulsa on the matter."

68. "The request for variance or waiver on restrictions regarding importation of ungraded medical waste should be denied based on insufficient public vetting, insufficient proposed ongoing monitoring, and the horrific track record of the equity firm proposing said variance. This is a public health threat that should not be condoned."

69. "I am writing in opposition to Reworld's variance request. This company has a long track record as a serial ecological offender. A basic search reveals numerous violations, fines, and community complaints tied to their operations nationwide. Frankly, it's hard to understand how DEQ is even considering this request. Does anyone at the agency bother to look into the environmental history of the applicants? Public trust depends on your willingness to hold repeat violators accountable-not reward them with exceptions. Granting this would signal a disturbing disregard for both environmental protection and community safety."

DEQ response: Reworld Tulsa is currently permitted to accept MSW and NHIW. In accordance with OAC 252:515-19-31(a), disposal of any quantity of hazardous, radioactive, or regulated polychlorinated biphenyl waste at a solid waste disposal facility is prohibited. The Application proposes to accept and process RMW at Reworld Tulsa.

In accordance with OAC 252:515-3-32, the Application includes five variance requests from the following: radiation interlock system, time and temperature, interlocks, periodic testing, and a test demonstration. DEQ finds the application includes the required demonstration of equal or greater protection required for variance approval. Radiation screening, time, temperature and testing considerations are still required but accomplished in a different way primarily due to unique facility design.

The Solid Waste regulations do not have requirements regarding air emissions. A separate Permit Modification has been issued from the DEQ Air Quality Division and encompasses emission monitoring requirements.

Reworld Tulsa is not a new facility, and the permit boundary is not expanding; therefore, information on location restrictions is not required to be submitted as part of the Application. Regardless, Solid Waste regulations do not have specific requirements regarding proximity to cities. City zoning is outside the scope of this permitting action.

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In accordance with OAC 252:515-19-34, DEQ issued a Permit Modification dated October 1, 2009, authorizing Reworld Tulsa to receive and process out-of-state NHIW waste streams in excess of 200 tons/day. Each NHIW waste stream is individually approved by DEQ. Reworld may not accept RMW from out-of-state unless it submits a permit modification to update its out-of-state waste plan.

Facilities located outside of Oklahoma are outside of DEQ jurisdiction and the scope of this permitting action. In accordance with OAC 252:151-7-15(b)(1), a permit or permit modification cannot be issued if the applicant is not in substantial compliance with the Oklahoma Environmental Quality Code, DEQ rules, and the terms of any existing permits or orders. Reworld Tulsa is currently in substantial compliance and has met all requirements in accordance with applicable solid waste regulations to properly manage regulated medical waste. DEQ does not have regulations regarding the location of ownership of facilities.