Message

From: Angela Shibata [ashibata@aqmd.gov]
Sent: 10/26/2017 9:26:13 PM
To: Mia, Marcia [Mia.Marcia@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]
CC: Andrew Lee [ALee@aqmd.gov]; Charles Tupac [ctupac@aqmd.gov]
Subject: RE: RE: Federal Incineration Requirements

Hello Marcia,

We are not familiar with Braden Steam. This project is for a facility called Medical Waste Services and they are using a CoronaLux for their medical waste processing. This equipment has been operating since 2015, when a research permit was issued to the facility.

Technical Description
This CoronaLux System destroys medical waste using pyrolysis with two stages of subsequent air pollution control using a plasma and holding chamber. The project will process < 3,000 lbs/day of medical waste. The medical waste is placed in a chamber, and the chamber is sealed. The chamber is then evacuated for 2 minutes prior to heating to remove gases/air from the chamber. Burner exhaust is introduced into the chamber to drive off remaining gases. The burner exhaust comes from two rich burn, sub-stoichiometric air, natural gas burners used to heat the chamber. The chamber is heated to gasify/pyrolyze the medical waste. The exhaust gases/air contaminants from the treated waste are controlled with plasma generated from high voltage electrodes, to break apart the exhaust gas molecules. The exhaust gas molecules pass through a holding chamber, which provides extended time (residence time) at high temperature to ensure the completion of reactions for proper destruction of air contaminants, before being released to atmosphere. Both the plasma and holding chambers used natural gas burners to heat the chambers.

As discussed in our teleconference from October 10, 2017, we are having problems trying to figure out how one would even apply or implement 40 CFR 60 Subpart Ec to the system and would greatly appreciate your assistance. According to Ec's preamble, it appears that Ec was designed for conventional combustion. The waste treatment system is a pyrolysis/gasifying process. Ec describes air pollution control systems not relevant or appropriate for this technology. The equipment's source test emission results cannot be converted into the emission units listed in Ec or any of the incineration subparts. Additionally, Ec only seems to allow for alternatives to the kinds of air pollution control system operating parameters to be monitored as indicated in 60.56c(j).

Once again, thank you very much for your time and consideration regarding this project.

Sincerely,
Angela Shibata

From: Mia, Marcia [mailto:Mia.Marcia@epa.gov]
Sent: Thursday, October 26, 2017 11:14 AM
To: Angela Shibata <ashibata@aqmd.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Andrew Lee <ALee@aqmd.gov>; Charles Tupac <ctupac@aqmd.gov>
Subject: RE: RE: Federal Incineration Requirements

Thank you Angela for your follow-up. Is this Braden Steam? I'm not sure that we discussed the name of the company during our call.

The test report says CoronaLux and Medical Waste Service. I have some technical information (in addition from the test results you sent) from R9 and I want to make sure it is the correct unit. If it is not Braden Steam, could you pls forward any additional technical descriptions of the process that you may have? We looked at a Corona Lux system in SC. It used

a plasma system. We determined that the Corona Lux system used by "e-Cycling" would be a HMIWI as well. I have attached that letter for your convenience.

I have not had a chance to discuss further with the program contact or R9. I will try to get that done early next week, some key folks are out this week.

Thank you for your patience and we will try to move it along as quickly as we can.

Marcia B Mia
Office of Compliance/Air Branch
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

From: Angela Shibata [mailto:ashibata@aqmd.gov]
Sent: Thursday, October 26, 2017 12:18 PM
To: Mia, Marcia <Mia.Marcia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Andrew Lee <ALee@aqmd.gov>; Charles Tupac <ctupac@aqmd.gov>
Subject: RE: RE: Federal Incineration Requirements

Hi Marcia,

I just wanted to follow up with you regarding your review of the source test results. This is a priority project of ours, so we greatly appreciate your expedited efforts on this.

Thank you very much,

Angela Shibata

From: Angela Shibata
Sent: Friday, October 13, 2017 11:37 AM
To: 'Mia, Marcia' <Mia.Marcia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Andrew Lee <ALee@aqmd.gov>; Charles Tupac <ctupac@aqmd.gov>
Subject: RE: RE: Federal Incineration Requirements

Hello Marcia,

Thank you very much for discussing this project with us. We appreciate your expertise. Please see the attached HWIW project source test results. As we had indicated in our discussion, we are under a lot of pressure to finalize this project. How quickly do you think you could get back to us regarding these results?

Thank you for your time and consideration regarding this project.

Sincerely,

Angela Shibata
Senior Air Quality Engineer
Engineering & Permitting
Energy/Public Services/Waste Management/Terminals
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Tel. (909) 396-2737
Fax. (909) 396-3341

From: Mia, Marcia [mailto:Mia.Marcia@epa.gov]
Sent: Thursday, October 12, 2017 7:27 AM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Angela Shibata <ashibata@aqmd.gov>
Cc: Andrew Lee <ALee@aqmd.gov>
Subject: RE: RE: Federal Incineration Requirements

Angela and Andrew,

Thanks for discussing the HMIW project with us on Tuesday. I don't recall getting the follow-up information from you. I think you were going to share some of the info that the source provided? Thanks.

Marcia B Mia
Office of Compliance/Air Branch
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

-----Original Appointment-----
From: Mia, Marcia
Sent: Monday, October 02, 2017 8:56 PM
To: Mia, Marcia; Hambrick, Amy; ashibata@aqmd.gov
Cc: Andrew Lee
Subject: RE: Federal Incineration Requirements
When: Tuesday, October 10, 2017 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: 1-855-564-1700; 1107219; Option 2: 234567

Angela,
I am at a conference this week so next week looks better. I hope that schedule works for you, but let me know if you need to counter. I invited Amy Hambrick too, she is the program lead.

Marcia B Mia
Office of Compliance/Air Branch
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

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pata <ashibata@aqmd.gov>
ember 29, 2017 5:43 PM

deral Incineration Requirements

Hello Marcia,

I just wanted to follow-up with you regarding scheduling a call to discuss the applicability and implementation of incineration regulations for pyrolysis units (more specifically for medical waste processing units). Are you available the first week of October?

Thank you very much for your time and consideration.

Angela Shibata

From: Angela Shibata
Sent: Wednesday, September 20, 2017 9:05 AM
To: 'mia.marcia@epa.gov' <mia.marcia@epa.gov>
Subject: Federal Incineration Requirements

Hello Ms. Mia,

Lisa Beckham had referred you to me regarding applicability of the incineration regulations to pyrolysis units and how we would go about implementing those requirements to a system that is not a traditional incinerator.

I was hoping that we could schedule a quick call later today, would you be available?

Thank you,

Angela Shibata

Senior Air Quality Engineer

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