Message

From: BECKHAM, LISA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75A0012699094CF59508BB04E90B393C-LBECKHAM]
Sent: 11/10/2015 8:56:02 PM
To: Guy Smith [gsmith@mdaqmd.ca.gov]
Subject: RE: Federally Applicable Regulations for Medical Waste Pyrolysis Units

Hi Guy-

Do you by any chance have a flow diagram for this process? It is likely that Subpart Ec applies. Depending on how the process is setup they may not meet the pyrolysis exemption – it would still be considered to "combust" HMIW.

Lisa Beckham
Environmental Engineer
Air Permits Office
EPA Region 9
(415) 972-3811

From: Guy Smith [mailto:gsmith@mdaqmd.ca.gov]
Sent: Thursday, May 07, 2015 3:59 PM
To: BECKHAM, LISA <BECKHAM.LISA@EPA.GOV>
Subject: Federally Applicable Regulations for Medical Waste Pyrolysis Units

Good Afternoon, Lisa:

I have a proposal on my desk for a Hospital Medical Infectious Waste Incinerator (HMIWI) using pyrolysis to reduce the HMIW to syngas and char. The syngas will initially be burned in a thermal oxidizer with no heat recovery/energy production, but that will likely happen once the operation settles out. The facility will have two identical main pyrolysis units, each capable of converting 2 tons of waste per hour and one secondary unit capable of 1 ton per hour which will only pyrolyze the char from the two primary units.

Try as I may, I cannot find a single NSPS that applies to this facility – here's my take on the likely candidates:

40 CFR 60, subpart Ce: This is a new unit, so Ce doesn't apply.
40 CFR 60, subpart Ec: Exempts pyrolysis units in 60.50c(f).
40 CFR 60, subpart E: Each incinerator has a charging rate of less than 50 tons per day.
40 CFR 60, subpart AAAA: Does not meet definition of MSW in 60.1465 (specifically excludes medical waste).
40 CFR 60, subpart BBBB: Construction will start after August 30, 1999.
40 CFR 60, subpart CCCC: Exempt if regulated by Ce or Ec, which these units are NOT, but the definition of Commercial Solid Waste seems (to me, anyway) to exclude HMIW.
40 CFR 60, subpart EEEE: Exempt if regulated by Ce or Ec, which these units are NOT, but the facility is neither a very small Municipal Waste Combustion Unit nor is it located at an institutional facility, and therefore does not meet the definition of an OSWI in 60.2977.

I'm sure that there has to be some USEPA regulation governing these facilities or they would be popping up all over the place. My research so far has turned up a few, but they have all been collocated with the hospital that generated the HMIWI.

I'd sure appreciate any insight you could give me on this one.

Thanks very much,

Guy Smith
Air Quality Engineer

Mojave Desert AQMD
760.245.1661
gsmith@mdaqmd.ca.gov