Message

From: Bill Winchester [bwinchester@scec.com]
Sent: 1/17/2014 5:22:26 PM
To: Salazar, Matt [Salazar.Matt@epa.gov]
CC: Karl Lany [klany@scec.com]; Kelly, Shaheerah [Kelly.Shaheerah@epa.gov]
Subject: FW: Questions Regarding SSI Rule Applicability for Pyrolysis Process
Attachments: ATT00001.txt

Importance: High

Matt:

Shaheerah Kelly suggested that I direct my questions regarding SSI rule applicability to your attention. I will transcribe the body of my message to Ms. Kelly, along with my specific questions, below:

...I'd like to know if the proposed technology (as described below) would be subject to the Sewage Sludge Incinerator (SSI) rules; more specifically 40 CFR Part 60 Subpart LLLL.

The proposed pyrolysis project would be located at a wastewater treatment facility but operated by a third party. The project is intended to demonstrate the feasibility of using pyrolysis technology on a small scale to reduce volume of pre-processed fertilizer pellets (fuel in this case), while enhancing digester gas and on-site digester gas utilization, thereby reducing the plant's dependence on supplementary natural gas for on-site power generation. The fuel is a byproduct of sewage digester sludge, but it is a commodity commonly used as fertilizer in the agricultural or landscaping industry. Furthermore, the process will improve the quality of the fertilizer pellets by removing organic materials, while retaining nitrogen and other nutrients. Essentially, the "char" will be a more stable (in terms of long term storage; odor; combustibility) and practical fertilizer, that maintains viability as a commodity after processing. The demonstration project will process approximately 6 tons per day of fertilizer pellets over a 10 month period (500 lbs/hr; 24 hrs/day; 5 days/week). The pyrolysis gas byproduct generated from the pellets will be reintroduced into the facility digester system and comingled with the plant's other digester gas to be combusted in biogas-fired cogeneration engines. The "char" will be shipped off-site to be used for fertilizer. At the conclusion of the demonstration project, the pyrolysis process will be terminated.

Based on the above description, can you please clarify:

1.) Are the fertilizer pellets actually considered Sewage Sludge?
2.) If not, what would EPA consider this commodity to be?
3.) Is the project subject to 40 CFR Part 60 Subpart LLLL, as an SSI unit?
4.) If so, will the project require a preconstruction siting analysis?
5.) If so, how long will EPA Region IX require to complete the analysis?
6.) If the project is not subject to the SSI rule, is there another applicable incinerator rule?

I really appreciate your consideration in the matter.

Best Regards,

Bill Winchester, CPP
Project Manager
Regulatory Compliance Services

Air Quality Specialists

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From: Kelly, Shaheerah [mailto:Kelly.Shaheerah@epa.gov]
Sent: Thursday, January 16, 2014 5:16 PM
To: Bill Winchester
Cc: Salazar, Matt
Subject: RE: Questions Regarding SSI Rule Applicability for Pyrolysis Process

Hi Bill,

Please contact Matt Salazar at Salazar.matt@epa.gov or 415-972-3982 for further information. Matt's office handles applicability determinations under 40 CFR part and 40 CFR part 63. I may provide assistance to the person assigned to responding to your request.

****
Shaheerah Kelly
Permits Office, Air Division (AIR-3)
U.S. Environmental Protection Agency, Region 9
San Francisco, CA 94105
Phone: 415-947-4156
Fax: 415-947-3579
Email: kelly.shaheerah@epa.gov

From: Bill Winchester [mailto:bwinchester@scec.com]
Sent: Thursday, January 16, 2014 4:49 PM
To: Kelly, Shaheerah
Cc: Lapka, Joseph; Karl Lany
Subject: Questions Regarding SSI Rule Applicability for Pyrolysis Process
Importance: High

Shaheerah:

I hope you and your family had a wonderful holiday season! Now that we're back to "the grind" I wanted to run something by you.

In the past you assisted me in answering some questions I had in regards to a staged gasification system, and the federal MSW incinerator rules – i.e., NSPS. There's a different process we're studying now and I'd like to know if the proposed technology (as described below) would be subject to the Sewage Sludge Incinerator (SSI) rules; more specifically 40 CFR Part 60 Subpart LLLL.

The proposed pyrolysis project would be located at a wastewater treatment facility but operated by a third party. The project is intended to demonstrate the feasibility of using pyrolysis technology on a small scale to reduce volume of pre-processed fertilizer pellets (fuel in this case), while enhancing digester gas and on-site digester gas utilization, thereby reducing the plant's dependence on supplementary natural gas for on-site power generation. The fuel is a byproduct of sewage digester sludge, but it is a commodity commonly used as fertilizer in the agricultural or landscaping industry. Furthermore, the process will improve the quality of the fertilizer pellets by removing organic materials, while retaining nitrogen and other nutrients. Essentially, the "char" will be a more stable (in terms of long term storage; odor; combustibility) and practical fertilizer, that maintains viability as a commodity after processing. The demonstration project will process approximately 6 tons per day of fertilizer pellets over a 10 month period (500 lbs/hr; 24 hrs/day; 5 days/week). The pyrolysis gas byproduct generated from the pellets will be reintroduced into the facility digester system and comingled with the plant's other digester gas to be combusted in biogas-fired cogeneration engines. The "char" will be shipped off-site to be used for fertilizer. At the conclusion of the demonstration project, the pyrolysis process will be terminated.

Based on the above description, can you please clarify:

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2.) If not, what would EPA consider this commodity to be?
3.) Is the project subject to 40 CFR Part 60 Subpart LLLL, as an SSI unit?
4.) If so, will the project require a preconstruction siting analysis?
5.) If so, how long will EPA Region IX require to complete the analysis?
6.) If the project is not subject to the SSI rule, is there another applicable incinerator rule?

Unfortunately, we're in a time crunch so your prompt reply is very much appreciated. If you need further clarification or have

Best Regards,

Bill Winchester, CPP
Project Manager
Regulatory Compliance Services

Air Quality Specialists

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