Message

From: Modak, Nabanita [Modak.Nabanita@epa.gov]
Sent: 1/22/2018 5:45:40 PM
To: Ayres, Sara [Ayres.Sara@epa.gov]; Owens, Katharine [Owens.Katharine@epa.gov]
CC: Gordon, Michael [Gordon.Mike@epa.gov]
Subject: FW: Coaltec gasification of municipal biosolids
Attachments: NHSM Request - Coaltec Energy USA(2).pdf; Region 3 Ruling re Section 112.pdf; Gasifier - Thermal oxidizer with labels (002).pdf

FYI

From: Gordon, Michael
Sent: Tuesday, January 16, 2018 8:48 AM
To: Modak, Nabanita <Modak.Nabanita@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Subject: FW: Coaltec gasification of municipal biosolids

Hi Marcia and Nabanita,

You may remember the Coaltec letter we worked on last year and was issued in August. The facility was using gasification (their words) to turn poultry litter in to activated carbon. We agreed that the unit was not subject to 129 standards because the "resultant syngas will not be in a container when combusted in a thermal oxidizer The company emailed Region 3 and asked if the same logic would apply to their system if gasifying biosolids from a wastewater treatment plant (ALCOSAN in the Pittsburgh area).

Ex. 5 Deliberative Process (DP)

Mike Gordon
Environmental Engineer
Office of Permits and State Programs
Air Protection Division
EPA Region III
1650 Arch Street
Philadelphia, PA 19103
(215)-814-2039
Gordon.Mike@epa.gov

From: Peter Thomas [mailto:pthomas@manuregy.com]
Sent: Monday, January 15, 2018 12:04 PM
To: Fernandez, Cristina <Fernandez.Cristina@epa.gov>; Gordon, Michael <Gordon.Mike@epa.gov>
Subject: Coaltec gasification of municipal biosolids

Cristina and Michael,

In late 2016, I wrote to Region 3 requesting that you confirm that when we process poultry litter to produce steam-activated carbon, our high-temperature, refractory-lined, oxygen-starved gasification process falls under Section 112 (Non-Hazardous Secondary Materials) of the Clean Air Act (see your letter dated December 5, 2016). You confirmed that when processing poultry litter, our gasification system and process fall under Section 112 in your Letter Ruling to us dated August 17, 2017 (see attached).

We are now in early-stage discussions with the Allegheny County Sanitation Authority (ALCOSAN wastewater plant), 3300 Preble Avenue, Pittsburgh, PA 15233 about drying and processing approximately 110 wet tons of

their biosolids per day using exactly the same Coaltec Energy model refractory-lined, oxygen-starved gasification system (see attached drawing). We also intend to hold discussions with other large municipal wastewater treatment plants about processing their biosolids in order to produce low-cost powder activated carbon. The low-cost Ecochar® powder activated carbon (PAC) would be used on-site by these wastewater treatment plants for adsorbing pharmaceuticals, pesticides, and hormones before these and other organic contaminants are discharged in their effluent. In the labs at Calgon Carbon Corporation (Pittsburgh), we have demonstrated that our low-cost PACs adsorb these organic micro-contaminants, and that when the PAC is produced at 1,800° F, micro-nutrients such as phosphorus are extremely tightly bound and therefore do not leach into the water.

We would appreciate it if you would confirm that drying and processing municipal biosolids at ~982° C (~1,800° F) in our refractory-lined, oxygen-starved gasification system also falls under Section 112 of the Clean Air Act. If you concur, we would appreciate it if you would confirm this in a letter ruling.

Regards,

Peter Thomas
Coaltec Energy USA, Inc.
434-989-1417 (Cell)
www.coaltecenergy.com