Message

From: Peter Thomas [pthomas@manuregy.com]
Sent: 3/8/2018 11:38:42 PM
To: Gordon, Michael [Gordon.Mike@epa.gov]
Subject: Coaltec gasification of municipal biosolids
Attachments: Layout and Legend (2).jpg; Gasifier - Thermal oxidizer with labels.pptx.pdf; Gasifier Cut-away.pdf; Reply to EPA re Section 112 for gasification of municipal biosolids.pdf

Michael,

Thank you for replying. Attached is a PDF document with our answers to your questions about the use of our automated, closed-loop, oxygen-starved, refractory-lined drying and gasification system for processing municipal sewage sludge, which I had called biosolids. Also attached are several engineering documents. Please don't hesitate to call or write if you have any additional questions. As I mentioned, it certainly would be helpful to have a nationwide decision regarding the application of Section 112 for our oxygen-starved gasification system.

Regards,

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

From: Gordon, Michael <Gordon.Mike@epa.gov>
Sent: Thursday, March 8, 2018 4:22 PM
To: Peter Thomas <pthomas@manuregy.com>
Subject: RE: Coaltec gasification of municipal biosolids

Hi Peter,

Following up from your previous e-mail. We are requesting some additional information in order for us to assist you with potential CAA Section 129 and 112 applicability. See attached letter for more details.

-Mike

Mike Gordon
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Office of Permits and State Programs
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EPA Region III
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(215)-814-2039
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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
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