From:	Lancey, Susan
To:	Gold, Ruth (DEM)
Cc:	Bird, Patrick; Aleida Whitney (Aleida.whitney@dem.ri.gov)
Subject:	RE: [EXTERNAL] : RE: Pyrolysis Application for medical waste treatment facility in Rhode Island
Date:	Wednesday, January 29, 2020 2:41:20 PM
Attachments:	Medrecycler - BLOCK FLOW DIAGRAM REV 7.pdf 2015 final e-Cycling ADI.pdf Aemerge Applicability Determination 2017_04_07.pdf Aemerge RedPak Applicability Determination 2018_10_31.pdf ETI_USEPA_Pyrolysis_Letter.pdf

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Hi Ruth,
Thank you for the flow diagram for the medical waste treatment facility being planned in Rhode Island. Could you get us a more detailed written description about the unit and process that we can review to give us a better idea of whether the unit may be regulated under Part 60 Subpart Ec?
The Part 60 Subpart Ec HIMWI rule has an exclusion for pyrolysis units, however, in the past we have taken a narrow view of units that qualify for this exclusion. We have issued several written determinations for units that describe themselves as pyrolysis units, but we found the units did not meet the definition of pyrolysis in the HIMWI rule. I am attaching a few determination letters about this issue.
Let us know if you have any questions. Thanks,
Susan Lancey
U.S. EPA New England
5 Post Office Square
Suite 100 (Mail Code: 05-2)
Boston, MA 02109
Phone: (617) 918-1656

From: Gold, Ruth (DEM) <ruth.gold@dem.ri.gov>
Sent: Monday, January 27, 2020 12:25 PM
To: Bird, Patrick <Bird.Patrick@epa.gov>
Cc: Lancey, Susan <lancey.susan@epa.gov>
Subject: RE: [EXTERNAL] : RE: Pyrolysis Application for medical waste treatment facility in Rhode Island
Pat,
They did not mention any federal rules in the application.
Ruth A. Gold
Supervisor – Permitting
Office of Air Resources
RI Dept. of Environmental Management
235 Promenade Street
Providence, RI 02908
Tel: 401-222-2808, Ext. 7110
Web: http://www.dem.ri.gov/programs/air/

From: Bird, Patrick <Bird.Patrick@epa.gov>
Sent: Mon, 01/27/20 11:57 AM
To: Gold, Ruth (DEM) <ruth.gold@dem.ri.gov>
Cc: Lancey, Susan <lancey.susan@epa.gov>

Subject: [EXTERNAL] : RE: Pyrolysis Application for medical waste treatment facility in Rhode Island

Thanks, Ruth!

Do you have any information on the company's interpretation of applicability to 40 CFR Part 60 Subpart Ec? That's the piece I'm interested in teasing out.

Pat

Patrick Bird
U.S. EPA - Region 1
5 Post Office Square, 05-2
Boston, MA 02109-3912
Phone: 617-918-1287
Fax: 617-918-0287
Email: bird.patrick@epa.gov

From: Gold, Ruth (DEM) <ruth.gold@dem.ri.gov>
Sent: Monday, January 27, 2020 11:39 AM
To: Bird, Patrick <Bird.Patrick@epa.gov>
Subject: Pyrolysis Application for medical waste treatment facility in Rhode Island

Hi Pat,

This is what I have electronically. If you need anything else, please let me know.

Good luck,

Ruth A. Gold
Supervisor – Permitting
Office of Air Resources
RI Dept. of Environmental Management
235 Promenade Street
Providence, RI 02908
Tel: 401-222-2808, Ext. 7110
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