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**Emission Guidelines (EGs) for
Commercial and Industrial Solid Waste
Incineration (CISWI) and Sewage
Sludge Incineration (SSI)**

AQCAC – September 19, 2016

Topics Covered

- **Background and Overview**
 - EPA Emission Guidelines for CISWI Incinerators
- **CISWI Unit Examples and Exemptions**
- **Review of Potential Sources**
- **MDE Proposed Action – Negative Declaration**
- **Background and Overview**
 - EPA Emission Guidelines for SSI Incinerators
- **SSI Delegation of Federal Implementation Plan**
- **Affected Source**
- **Schedule for SSI Delegation Letter**



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CISWI Emission Guidelines

- On June 23, 2016, EPA published final Emission Guidelines (EGs) for Commercial/Industrial Solid Waste Incinerators (CISWI).
- EGs codified under 40 CFR 60 Subpart DDDD.
- Publication of the EGs in the Federal Register begins a six month clock for states to take action.
 - States must either seek delegation of federal authority and submit a state plan or submit a letter of negative declaration.



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CISWI Examples

- A CISWI unit is an incinerator that is used to burn solid waste as defined in 40 CFR part 241 (§ 60.2875, § 60.2550) at a commercial or industrial facility.
- Examples of CISWI units include:
 - Units designed to incinerate solid waste;
 - Energy recovery units designed to recover heat that combust solid waste;
 - Waste burning kilns that combust solid waste in the manufacturing of a product; and
 - Small, remote incinerators.



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Exempt Categories

- The following categories are not considered CISWIs under EGs:
 - Air curtain incinerators;
 - Pathological waste incineration units;
 - Municipal waste combustion units;
 - Medical Waste incineration units;
 - Small power productions facilities;
 - Cogeneration facilities;
 - Hazardous waste combustion units;
 - Material recovery units;
 - Sewage treatment plans;
 - Sewage sludge incineration units; and
 - Other solid waste incineration units.



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North American Industrial Classification System (NAICS) Codes

- EGs list specific NAICS categories that are used to identify potential CISWI sources.
- MDE conducted a review of more than 40 incinerators operating in Maryland and determined that none meet the criteria of CISWI.
- Only 4 incinerators did come under specific NAICS codes, but further review by MDE determined these units did not qualify as CISWI.

Category	NAICS	Examples of potentially regulated entities
Any industrial or commercial facility using a solid waste incinerator	333, 336	Manufacturers of machinery; manufacturers of transportation equipment

Negative Declaration

- MDE determined that there are no CISWI units operating in Maryland.
- As a result, MDE will be submitting a negative declaration letter to EPA in late 2016.
- If, at a later date, an existing CISWI unit is found, the federal plan implementing the emission guidelines would automatically apply to that CISWI unit until a state plan is submitted and approved by EPA.



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Sewage Sludge Incinerators (SSI)

- On April 14, 2016, EPA issued EGs and Federal Plan Requirements for SSI.
- SSI units are enclosed incinerators located at a wastewater treatment facility which combust domestic sewage sludge for the purpose of reducing the volume of material by removing the combustible matter.
- Maryland has one SSI facility.



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SSI Delegation of Federal Implementation Plan

- MDE intends to request full delegation of authority to implement the Federal Plan Requirements for SSI units.
- MDE's delegation request will include:
 - Demonstration that MDE has adequate resources and legal authority to administer and enforce the Federal SSI Plan.
 - An emissions inventory of existing affected facilities in Maryland.
 - A public hearing certification.
 - A Memorandum of Agreement developed with EPA Region III upon receipt of request for delegation.



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Affected Source

- Washington Suburban Sanitary Commission (WSSC) plant treats primarily domestic wastewater and has a design capacity of 30.6 million gallons per day (gpd).
- The plant has two multiple hearth incinerators each equipped with a flue gas recycle system, venturi scrubber, wet electrostatic precipitator (WESP) and regenerative thermal oxidizer (RTO).
- Dense waste matter is burned in these multiple hearth incinerators to reduce volume by approximately 90 percent.
- Remaining residual ash is sent to landfill.



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Schedule

- **October 28, 2016 - Submit General Notice to DSD**
- **November 14, 2016 - NPAs published in Maryland Register**
- **December 15, 2016 - Public Hearing**
- **January 2017 - Submit State Plan to EPA**



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