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

AQCAC – September 19, 2016
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• CISWI Unit Examples and Exemptions

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• Background and Overview
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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.
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.
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.
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.

<table>
<thead>
<tr>
<th>Category</th>
<th>NAICS</th>
<th>Examples of potentially regulated entities</th>
</tr>
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<tbody>
<tr>
<td>Any industrial or commercial facility using a solid waste incinerator</td>
<td>333, 336</td>
<td>Manufacturers of machinery; manufacturers of transportation equipment</td>
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</table>
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.
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.
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 delegation request.
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.
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