

Kornak, Kate F (DEC)

From: Prunier, Denise (DEC)
Sent: Thursday, December 06, 2018 12:36 PM
To: Prince Knight (prince.knight@tradebe.com)
Cc: Darrell Monk (Darrell.Monk@tradebe.com); Tita LaGrimas (Tita.LaGrimas@tradebe.com); McPherson, Gary J (DEC); Hadersbeck, Joseph E (DEC); Kornak, Kate F (DEC)
Subject: Norlite's Revised HWC MACT Petition Request - HW Burning During Commissioning - November 2018 - Clarification

Follow Up Flag: Follow up
Flag Status: Flagged

The Department has received and reviewed the recent revised petition from Norlite requesting to be allowed to burn hazardous waste for a maximum of 180 days following the design changes as part of Project Delta and prior to the submission of a Notice of Compliance (NOC). Although 40 CFR Part 63.1206(b)(5) restricts burning of hazardous waste (HW) to a maximum period of 30 days for the purposes of performance testing and pre-testing, additional time may be granted for these or other purposes if found warranted and approved by the Department.

The following is granted by the Department:

60 days for commissioning by the vendor – Utilizing liquid low-grade fuel (LLGF) during the 60 days of commissioning following the changes to the design is an approved requested time period in order for the vendor to test the system and work out any potential “bugs”.

30 days to conduct CPT following vendor commissioning – As per the regulation, Norlite needs to notify the Department with a description of the design changes proposed and submit a CPT protocol for the kilns for approval by the Department 60 days prior to the changes. Norlite will be allowed to burn HW for a period of 30 days following the vendor commissioning period of 60 days after design changes have been made. The Department believes this period of time, along with the vendor commissioning period, is sufficient for Norlite to work out their own “bugs” prior to performance testing.

60 days to submit NOC following testing – The Department approves continued burning of HW after the performance testing and prior to submission of a NOC for a period not to exceed 60 days.

Norlite is granted a maximum total of 3600 non-consecutive hours of HW burning for the purposes of commissioning, pre-testing and performance testing following the design changes proposed under Project Delta and up until the time a NOC is submitted to the Department. Norlite must operate the kilns within the following parameter limits at all times while burning HW:

Process and CEM Parameters

Maximum Total and Pumpable LLGF Feed Rate - 10.5 gpm

Maximum Shale Feed Rate - 24.3 tph

Minimum LLGF Atomization Pressure - 35.9 psi

Minimum Back End Temperature 866 °F

Maximum CO Concentration @ 7% O₂ – 100 ppmvd

APC Parameters

Maximum GCT Exit Temperature – 400 °F

Maximum Baghouse Inlet Temperature – 400 °F

Minimum GSA Lime Feed Rate – 209 lb/hr

Minimum GSA Lime Carrier Fluid Flow Rate – 180 scfm

Constituent Feed Rates

Maximum Total Chlorine Feed Rate – 92.6 lb/hr (12-HRA)

Maximum Total SVM Feed Rate (Cd & Pb) – 5.79 lb/hr (12-HRA)

Maximum Total LVM Feed Rate (As + Be + Cr) – 4.0 lb/hr (12-HRA)

Maximum Total Pumpable LVM Feed Rate – 7.0 lb/hr (12-HRA)

Maximum Total Mercury Feed Rate – 0.007 lb/hr (12-HRA)

Thank you for your request. Let me know if you have questions or concerns.

Denise Prunier, PE

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