UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

November 25, 1980

Mr. Daniel J. Dent
Project Engineer
Bechtel, Inc.
15740 Shady Grove Road
Gaithersburg, Maryland 20760

Dear Mr. Dent:

This is in response to your letter of October 7, 1980, in which your requested guidance on PSD applicability for refuse-to-energy facilities. Specifically, you requested information on how the daily firing rate of such a facility should be determined.

To determine if the facility in question is capable of charging 250 tons of refuse per day (and thus falling into the 100 ton major source category for PSD applicability) the firing rate should be based on the solids content of the municipal waste and the dry weight of the papermill sludge. These parameters are used in order to maintain consistency with applicability and source testing under the new source performance standards for incinerators and sewage treatment plants (See 40 CFR 60, Subparts E and O).

If you have any questions regarding this determination, Please contact Janet Littlejohn of my staff at 755-2564.

Sincerely,

Edward E. Reich, Director
Division of Stationary
Source Enforcement

Bechtel Incorporated
15740 Shady Grove Road
Gaithersburg, Maryland 20760
301-258-3000

October 7, 1980

NM-8

Edward Rice, Director
Division of Stationary Source Enforcement
Environmental Protection Agency
401 M Street, S.W.
Washington, D. C. 20460

Dear Mr. Rice:

Subject: Bechtel Job 14487
New Milford Project
PSD Regulations -
Qualifying Definition of Sludge

We are presently engaged in a feasibility study for a refuse-to-energy facility to be located in the State of Connecticut with capabilities of steam and/or electricity production. The facility will utilize modular incinerators to co-fire both municipal solid waste (MSW) and papermill sludge. The papermill sludge will have a solids content of approximately 35 percent, and the moisture content of the MSW will be in the range of 20 to 25 percent.

PSD regulations at present do not define sludge for purposes of co-disposal, and we are therefore not sure whether the wet or dry weight of the sludge should be used in arriving at the total firing rate at the facility. That is, in the 250 tons/day cut off limit that determines whether an incinerator is a major source, should the dry weight of the co-fired sludge be used in reckoning that component of the mixed waste.

Please call me if there are any questions concerning this request. We would appreciate your written response as soon as possible to enable us to proceed with the sizing of this facility.

Very truly yours,

D. J. Dent
Project Engineer

DJD:FR:jd

cc: W. R. Elliott
F. S. Roberts