



National Steering Committee

Jennifer Collins, Chair
Indiana Department of Environmental
Management
(317)234-9730
Jcollins1@idem.in.gov

Donovan Grimwood, Vice-Chair
Tennessee Department of Environment
and Conservation
(615)532-4966
Donovan.Grimwood@tn.gov

Regional Representatives

Region 1 – Sara J. Johnson, NH
Region 2 – Edward Bakos, NJ
Region 3 – Jeremy Hancher, PA
Region 4 – Donovan Grimwood, TN
Region 5 – Jenifer Dixon, MI
Region 6 – Lloyd Kirk, OK
Region 7 – Nancy Larson, KS
Region 8 – John Podolinsky, MT
Region 9 – Eric Florio, AZ
Region 10 – Belinda Breidenbach, ID

www.nationalsbeap.org

October 8, 2020

EPA Proposal for changes to Other Solid Waste Incineration (OWSI) units rule, 40 CFR 60 Subpart EEEE

Docket ID No. EPA-HQ-OAR-2003-0156

Dear EPA Staff:

The National Steering Committee (NSC) for the national network of state Small Business Ombudsman (SBO) and Small Business Environmental Assistance Programs (SBEAP) thanks you for the opportunity to comment on the proposed changes to the Other Solid Waste Incineration (OWSI) units rule. The state SBO/SBEAPs were created under section 507 of the Clean Air Act Amendments of 1990. The NSC of the SBEAPs would like to comment in support of two sections of the proposed changes for the OWSI rule.

Section 2: Proposed Revision to Applicability of OSWI requirements

We support the proposal to remove pyrolysis from the definition of a municipal solid waste combustion unit.

Pyrolysis is a thermochemical process conducted at 400-600 °C in the absence of oxygen. The composition of the primary products depend on the temperature, pressure and heating rate of the process (<https://www.education.psu.edu/egee439/node/537>)

Pyrolysis is not combustion nor are the primary products, which could include combustible gases, solid waste. Therefore, it cannot be considered municipal solid waste combustion. Because a pyrolysis unit may be closely coupled with a combustion unit, any combustible gases generated in the pyrolysis unit can be combusted providing the necessary heat input for the pyrolysis unit without requiring much if any supplemental heat input.

A pyrolysis unit can be used to recover products from materials such as waste tires and carbon fibers which have typically been difficult to recycle. Other products can include oils, fibers, metals, and fuel. Pyrolysis units can be used for specific types of materials such as a woody biomass to produce a more uniform product such as bio-char and/or combustible gases. It may also enhance recovery of valuable components from waste tires which would otherwise be quartered and disposed in a sanitary landfill.

Small businesses sometimes see the potential for pyrolysis as a niche that they can fit into in that it helps deal with a waste issue and creates by-products in the form of recovered materials, energy, and sometimes biochar (depending on material undergoing pyrolysis). Continuing to include pyrolysis in the definition of municipal solid waste combustion units discourages small business involvement and innovation in this field. Especially when pyrolysis is not actual combustion of materials.

Section 7: Proposed Revisions to Title V Permitting Requirements for ACIs (Air Curtain Incinerators) Burning Only Wood Waste, Clean Lumber, and Yard Waste

We support the proposal to eliminate the Title V permitting requirement for ACIs.

ACIs are typically mobile units used for land clearing operations such as the disposal of unwanted yard and tree wastes in a safe and effective manner. When storms pass through, regardless of location, large amounts of debris accumulate, often faster than a municipality can mulch it or otherwise dispose of it. ACIs provide a method of

reducing large stockpiles of debris and emitting less air pollution than open burning. Small businesses that are involved in tree care may also use small units as methods of disposing of accumulated tree debris, especially if they do not have the space to create and maintain large piles of mulch.

By removing ACIs from the regulatory requirement to obtain a Title V permit, this removes the unnecessary and expensive requirement that often discourages ACI use and instead creates conditions where open burning of wood waste occurs instead. As open burning emits a greater quantity of air pollutants, it would make sense to encourage a reliable method of disposal that is less polluting. The majority of smaller ACIs operating at a rate of 8.5 tons/hr. or less, do not have the potential to emit more than 100 tons/year of Carbon Monoxide, based on test results from the ACI manufacturer, Air Burner.

In conclusion, the NSC support the proposed changes to 40 CFR 60 Subpart EEEE regarding to pyrolysis units and ACIs because of the positive impact that this will have on small businesses and municipalities.

Sincerely,

Jennifer Collins, Chair, National Steering Committee

Donovan Grimwood, Vice Chair of the National Steering Committee

CC: David Rostker, U.S. Small Business Administration, Office of Advocacy
Rhonda Wright, U.S. EPA, Office of Air Quality Planning and Standards
Paula Hoag, U.S. EPA, Office of Small and Disadvantaged Business Utilization