

# Update on Proposed Solid Waste Rule for Incinerators

**Jim Welp**  
**Black & Veatch**

## NBP-WEF Holds Future of Biosolids Management Forum

- Purpose: Identify trends in technology, operations, and management; regulatory and public policy drivers; research needs; and professional and training needs over the next three, five, and ten years for biosolids.

## POTWs are Resource Recovery Centers

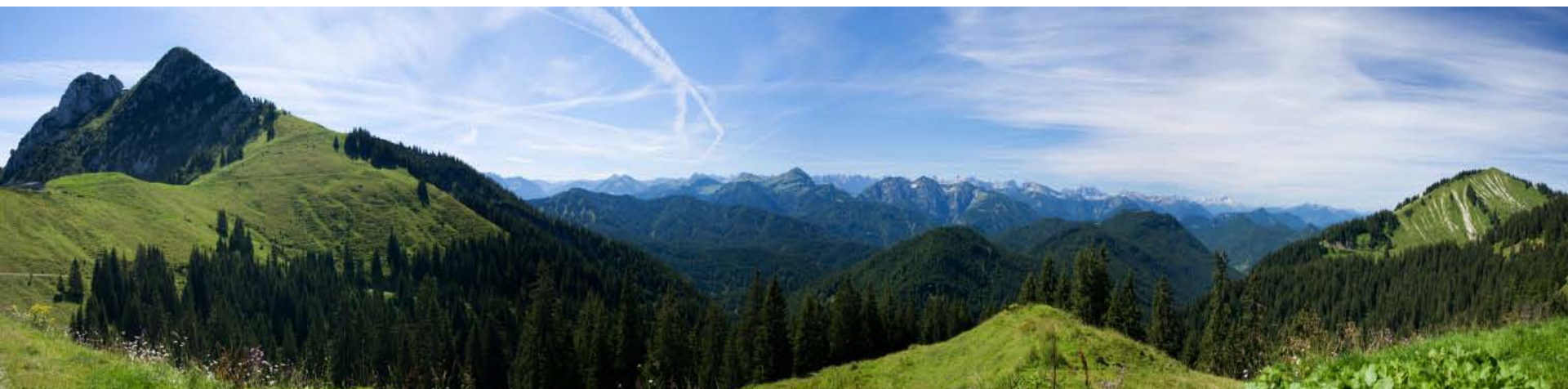
- Nutrients – N, P, and soil conditioner
- Energy – heat, power, fuel
- Water – clean water
- Other

## All Biosolids Management Options have Issues

- Thermal Oxidation - solid waste and MACT standards, public acceptance
- Land Application (and EQ products) - P, odors, trace organics, public education, public acceptance
- Landfilling - Organics, stabilization requirements, public acceptance

## The Broader View

- More stringent requirements are coming that will effect your program
- All options need to be on the table – not one solution
- Competing program investments with CSO's, stormwater, nutrients,...



# Outline

- Combustion principals and benefits
- Proposed ruling
- Impact on thermal oxidation facilities
- Energy recovery
- Conclusions
- Mill Creek and Southerly WWTPs pictures

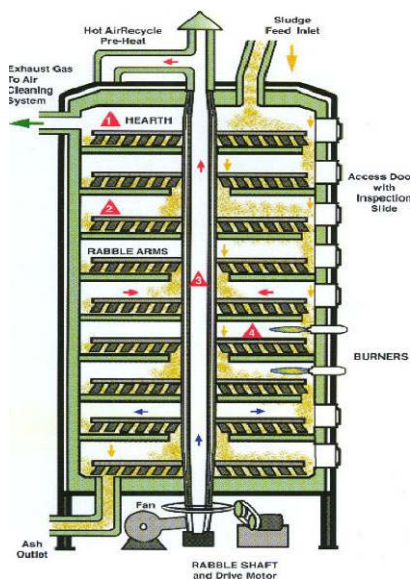
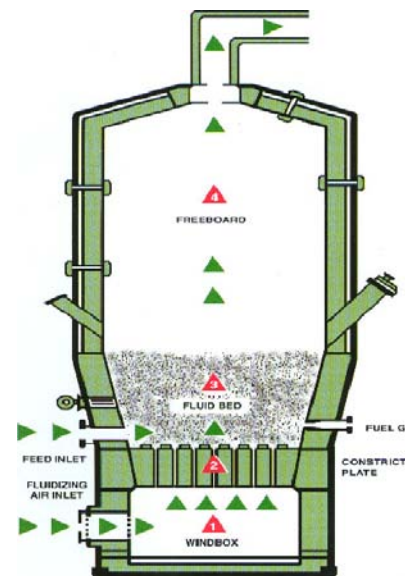
# Combustion Principals and Benefits

## Combustion Principles

- Combustion - produces same end products ( $\text{CO}_2$ ,  $\text{H}_2\text{O}$ , and  $\text{SO}_2$ ) as other solids management processes but at different rates
  - Incineration: ~0.1 to 60 minutes
  - Digestion: ~15 to 30 days
  - Composting: ~1 to 2 months
  - Land Application: ~1+ years

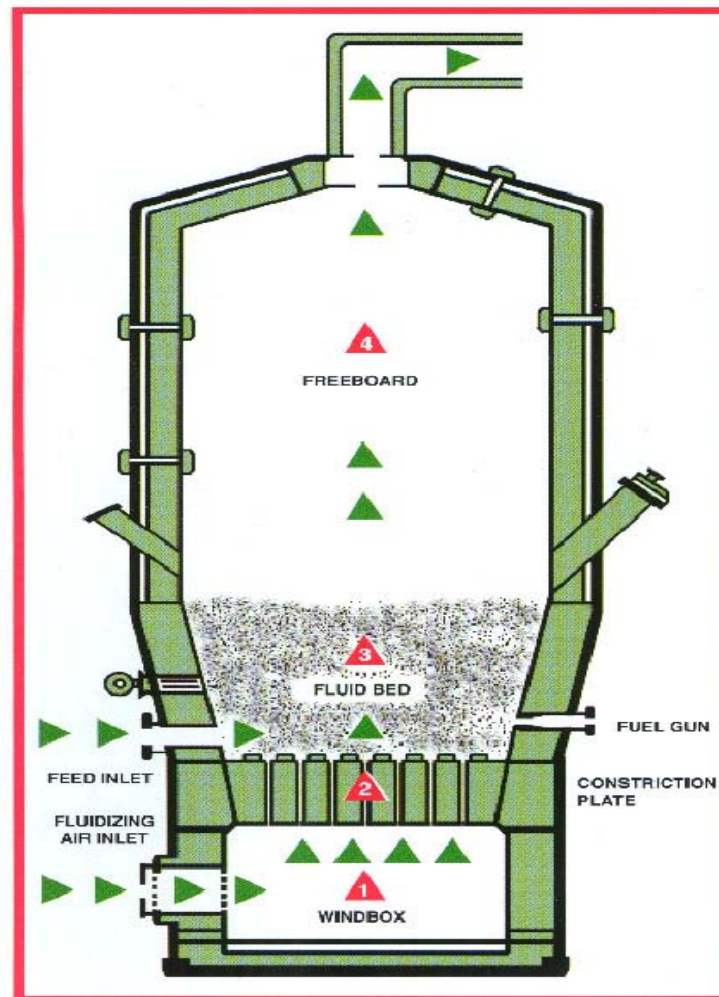
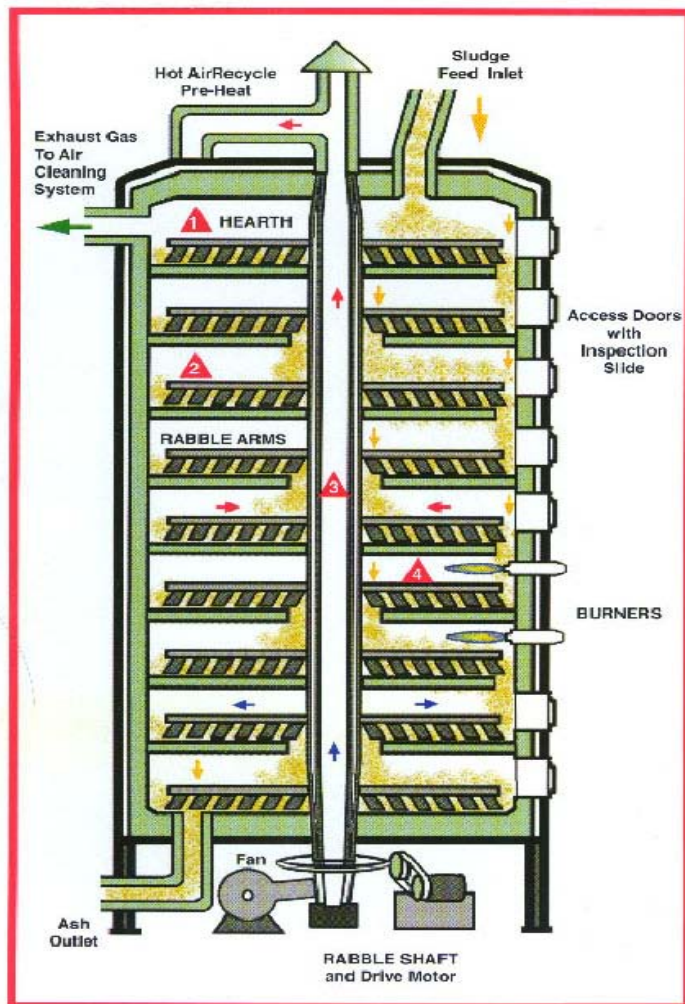
# Incineration Technologies

- Fluid Bed Incineration
  - Newer technology
  - All new units in last ~12 years

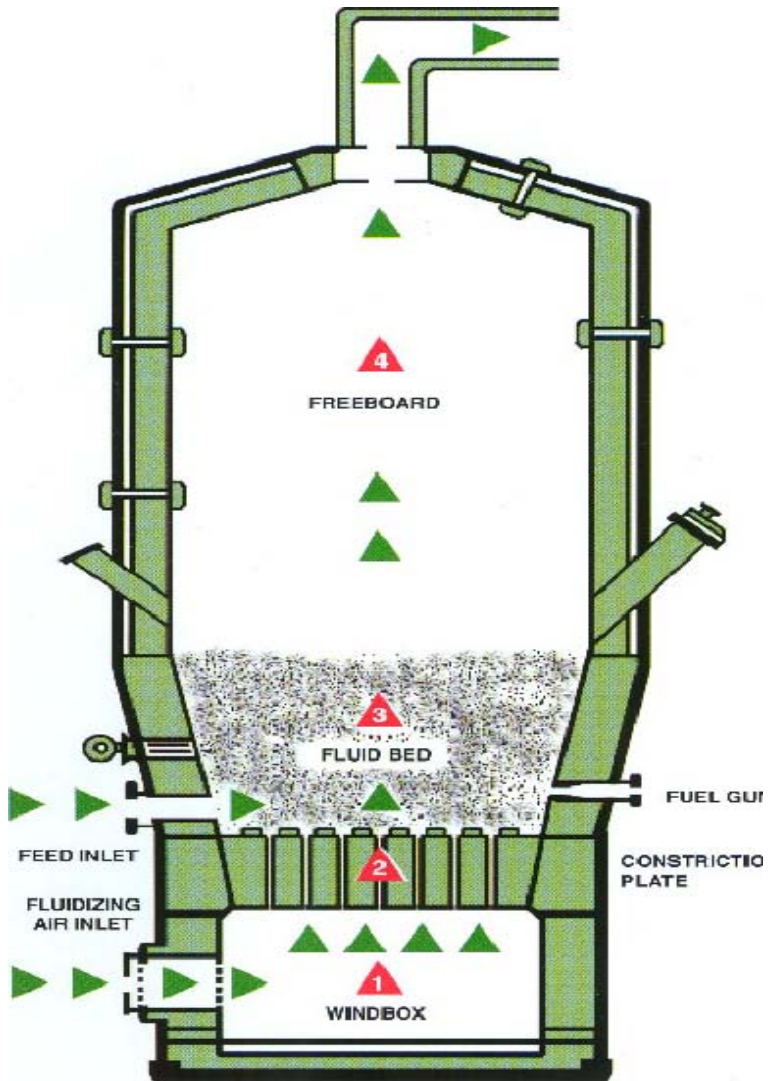


- Multiple Hearth Incineration
  - More units in service but units are older
  - Upgrades needed for energy efficiency and cleaner emissions

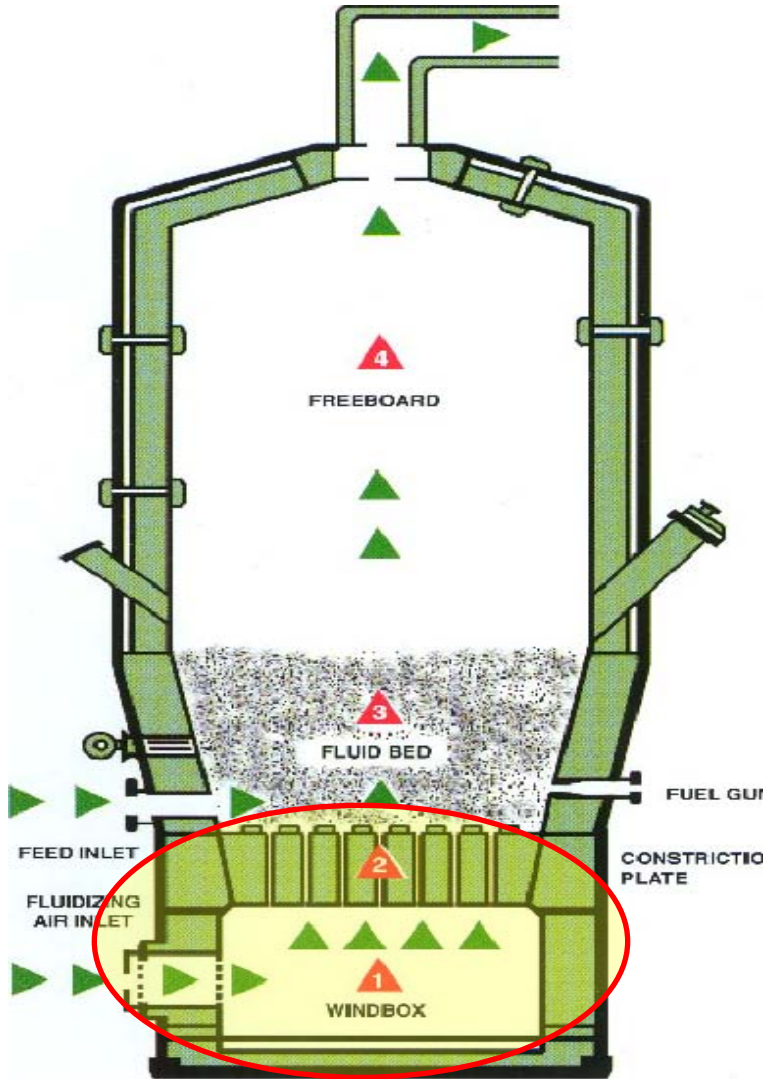
# MHI and FBI – How do they work?



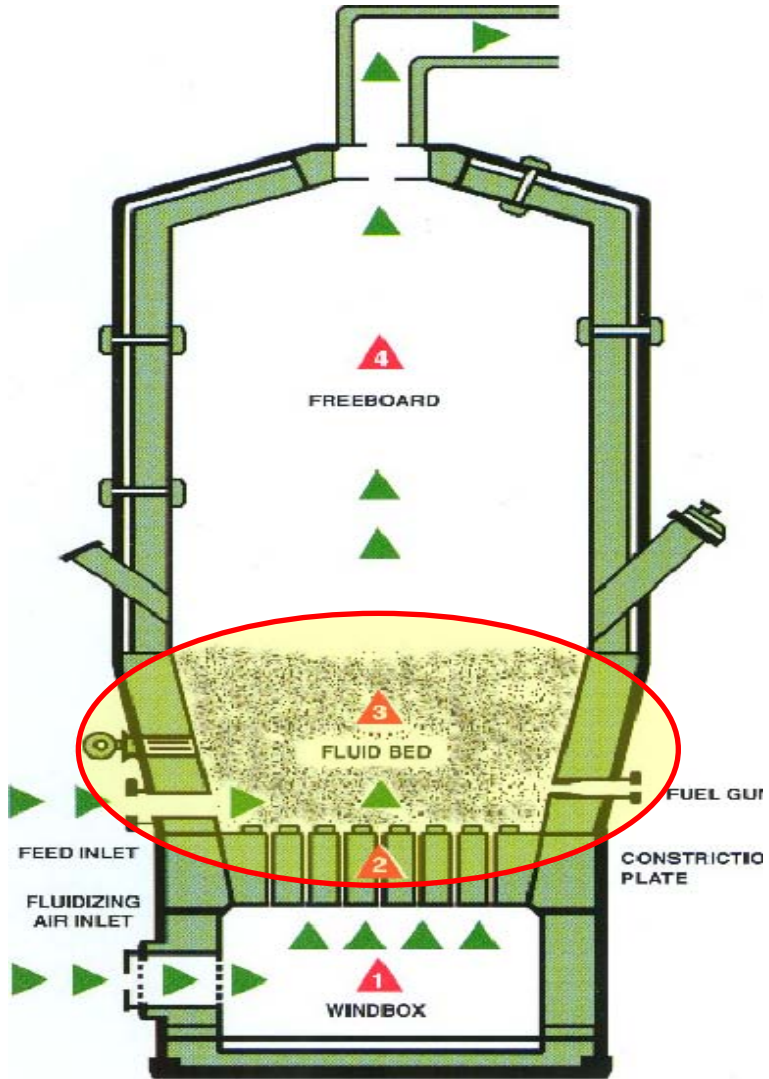
# Fluid Bed Reactor



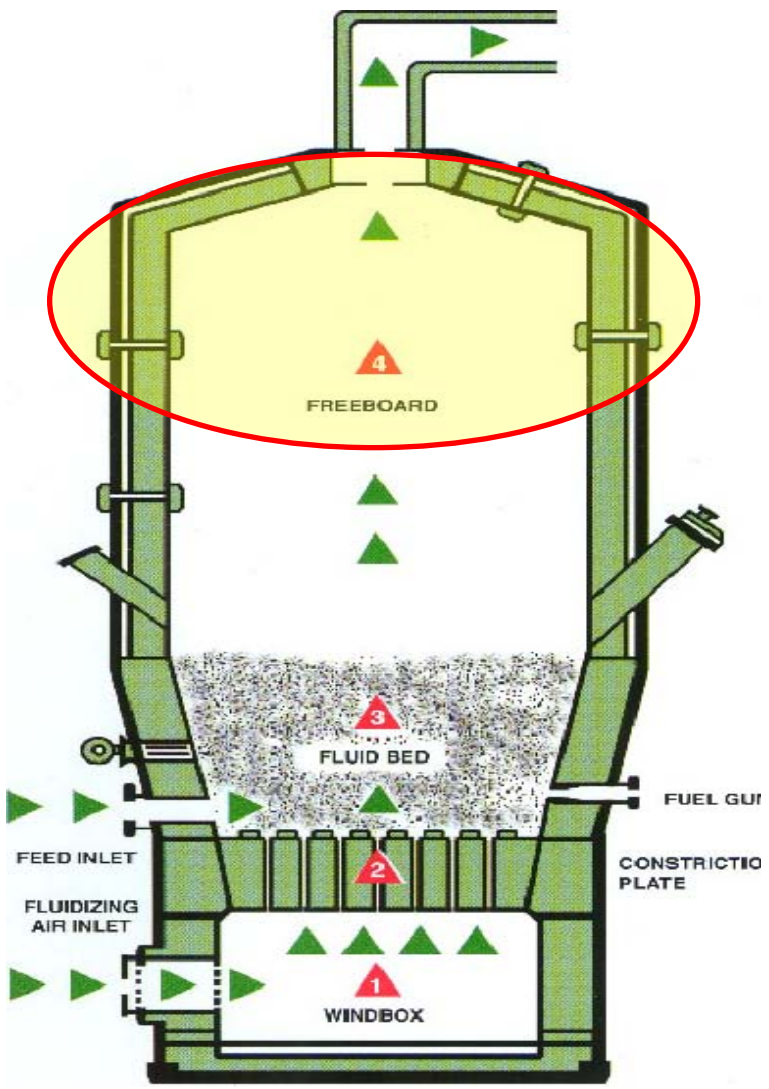
# Windbox



# Fluid Bed



# Freeboard



## Thermal Oxidation Benefits

- Complete Stabilization
  - Large volume and mass reduction
  - Pre-stabilization not required
- Energy Efficient
  - Low auxiliary fuel requirements
  - Sustainable operation with clean emissions
- Neighbor Friendly
  - Operates continuously without visible emissions
  - Lowest truck traffic
  - Lowest odor potential
- Cost Effective



# Proposed Ruling

## EPA Offices...Who makes the rules?

- Water – NPDES, 503
- Air – CAA Section 112 and 129
  - Local “non-attainment areas”
- Resource Recovery (Solid Waste) – RCRA, landfills
  - Definition redefined due to activist lawsuit

# Regulatory Impacts from EPA Solid Waste Proposed Regulation

- All sewage sludge is a solid waste
  - Intended to cover SSIs - not other biosolids management practices
- Solid waste definition requires Section 129 of CAA
  - MACT (maximum achievable control standards) to replace GACT in Section 112 of CAA
  - Top 12% of operating facilities (or top 5 if less than 30)
- EPA accepts that this may increase landfilling
- Law of unintended consequences...

## SSI MACT – pollutants / surrogate list and data requested as part of ICR testing

- **Mercury** – no surrogate
- **Filterable PM** – for non-mercury metallic HAP
- **SO<sub>2</sub>** or **HCl** – for acid gas HAP
- **CO** – for non-dioxin / furan organic HAP
- **Dioxin / furan** organic HAP
- Others: **Cadmium, lead, NO<sub>x</sub>, and opacity**

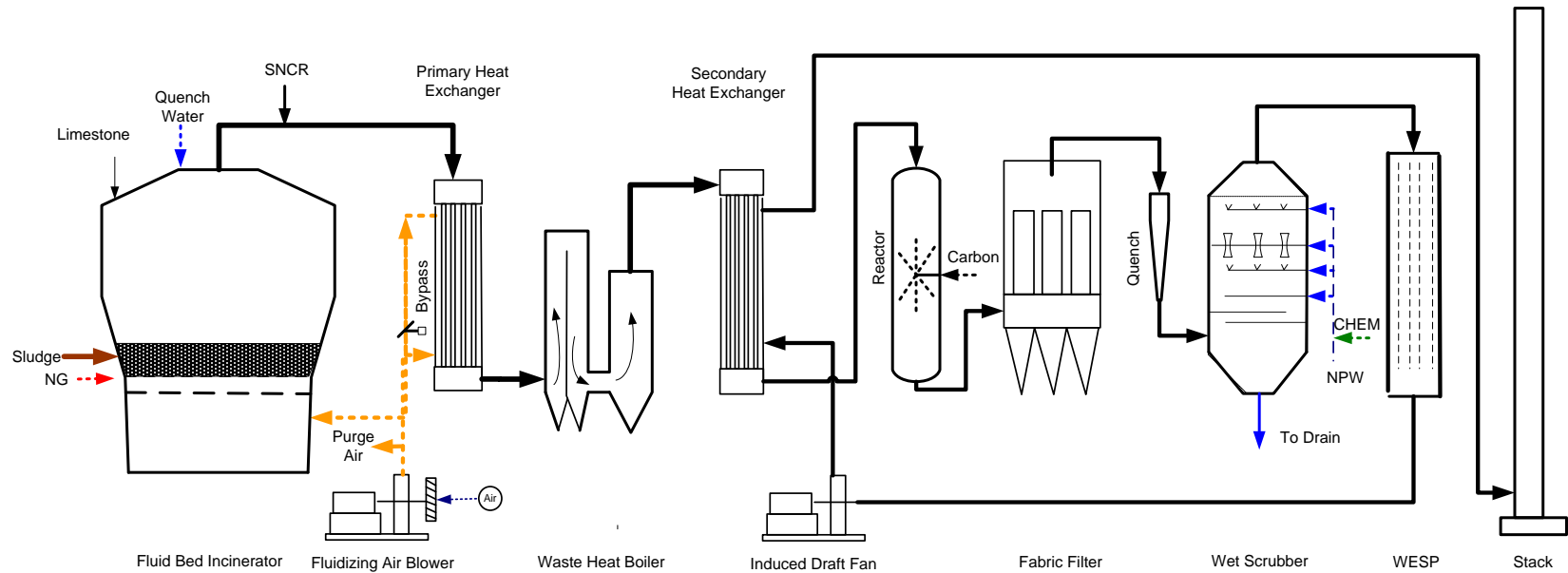
# Proposed MACT Standards

<b>Parameter @ 7% O<sub>2</sub></b>	<b>Existing MHI</b>	<b>Existing FBI</b>	<b>New SSI</b>
Cadmium (mg/dscm)	0.095	0.0019	0.00051
Dioxin/Furan, TMB (ng/dscm)	5.0	0.061	0.024
Dioxin/Furan, TEQ (ng/dscm)	0.32	0.056	0.0022
CO(ppmv)	3900	56	7.4
HCl (ppmv)	1.0	0.49	0.12
Mercury (mg/dscm)	0.02	0.0033	0.001
NO <sub>x</sub> (ppmv)	210	63	26
Opacity, %	10	0	0
Lead (mg/dscm)	0.30	0.0098	0.0053
PM, filterable (mg/dscm)	80	12	4.1
SO <sub>2</sub> (ppmv)	26	22	2.0

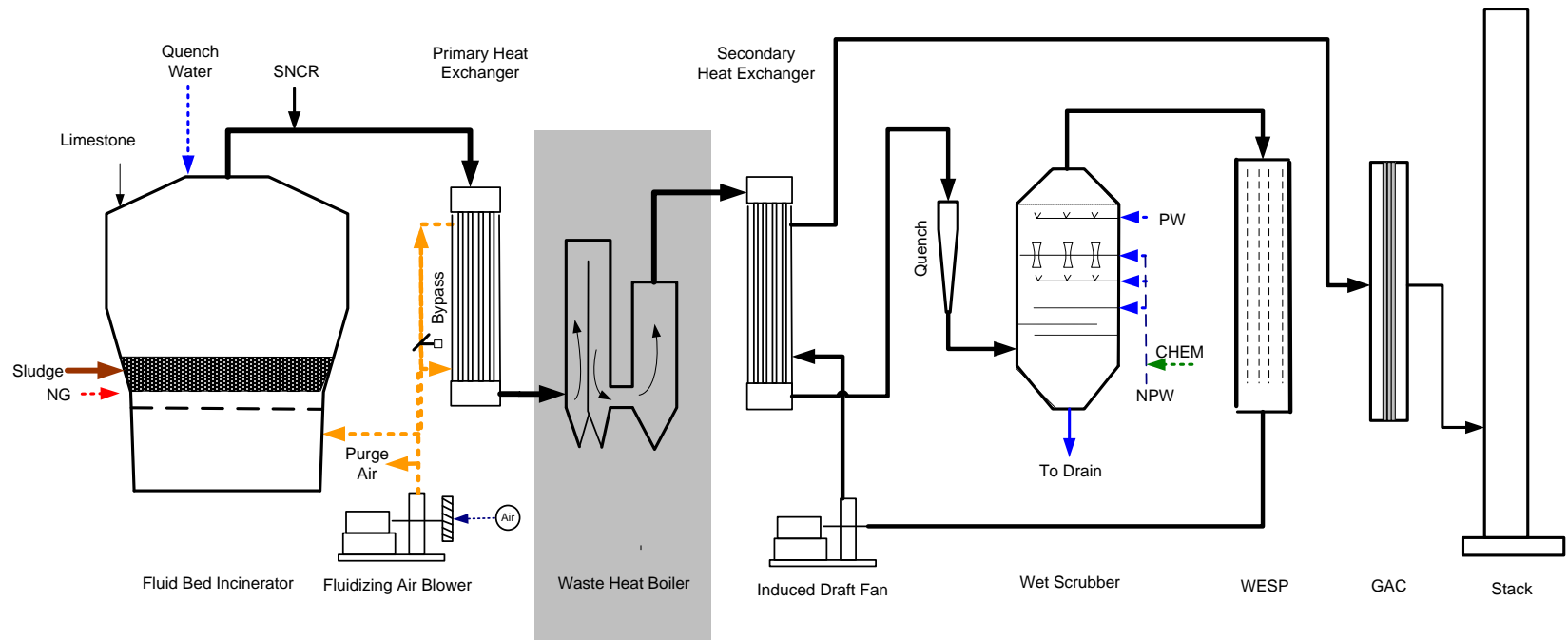
# EPA “Cherry Picked” Emission Limits

<b>Parameter @ 7% O<sub>2</sub></b>	<b>New SSI</b>	<b>Location</b>	<b>Sample Size</b>
Cadmium (mg/dscm)	0.00051	NCTZOsborne	3
Dioxins/Furans, TMB (ng/dscm)	0.024	MIYpsilanti	3
Dioxins/Furans, TEQ (ng/dscm)	0.0022	MIYpsilanti	3
CO (ppmv)	7.4	MIYpsilanti	6
HCl (ppmv)	0.12	NCTZOsborne	3
Mercury (mg/dscm)	0.001	MNStPaulMetro FBR3	36
NO <sub>x</sub> (ppmv)	26	NCTZOsborne	3
Opacity, %	0	all	
Lead (mg/dscm)	0.0053	NCTZOsborne	3
PM, filterable (mg/dscm)	4.1	MNStPaulMetro FBR2	12
SO <sub>2</sub> (ppmv)	2.0	MNStPaulMetro FBR1	3

# Dry ash fluid bed system (St. Paul, MN)

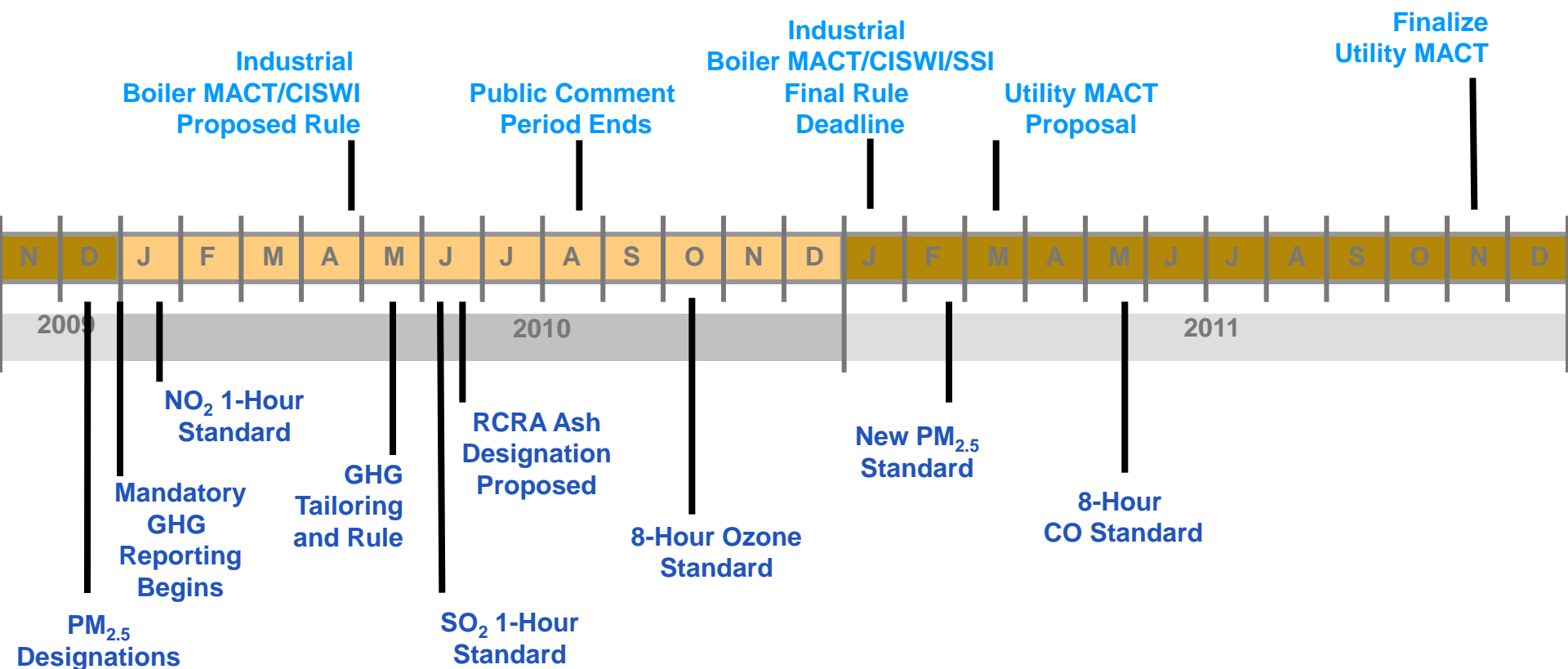


# Wet ash system (Ypsilanti, MI)



# Timing with Other Regulatory Considerations

- Existing sources to comply by ~ January 2014
- New sources to comply upon startup



## Regulatory Update!

- 80 comments received
- EPA does not intend to re-pose the rule
- July 15, 2011 requested to fully consider responses

FOR IMMEDIATE RELEASE

December 7, 2010

### **EPA Seeks New Timetable for Reducing Pollution from Boilers and Incinerators**

***Agency committed to developing rules that are  
protective, cost effective and based on sound science***

WASHINGTON – In a motion filed today in the federal District Court for the District of Columbia, the U.S. Environmental Protection Agency (EPA) is seeking an extension in the current court-ordered schedule ...

# Impact on Thermal Oxidation Facilities

## Operational Impacts

- Better understanding of operational changes and impact on emissions
  - No exemption for startup, shutdown, and malfunction
  - Need “steady state” conditions – small changes
- All units likely to need emission equipment upgrades

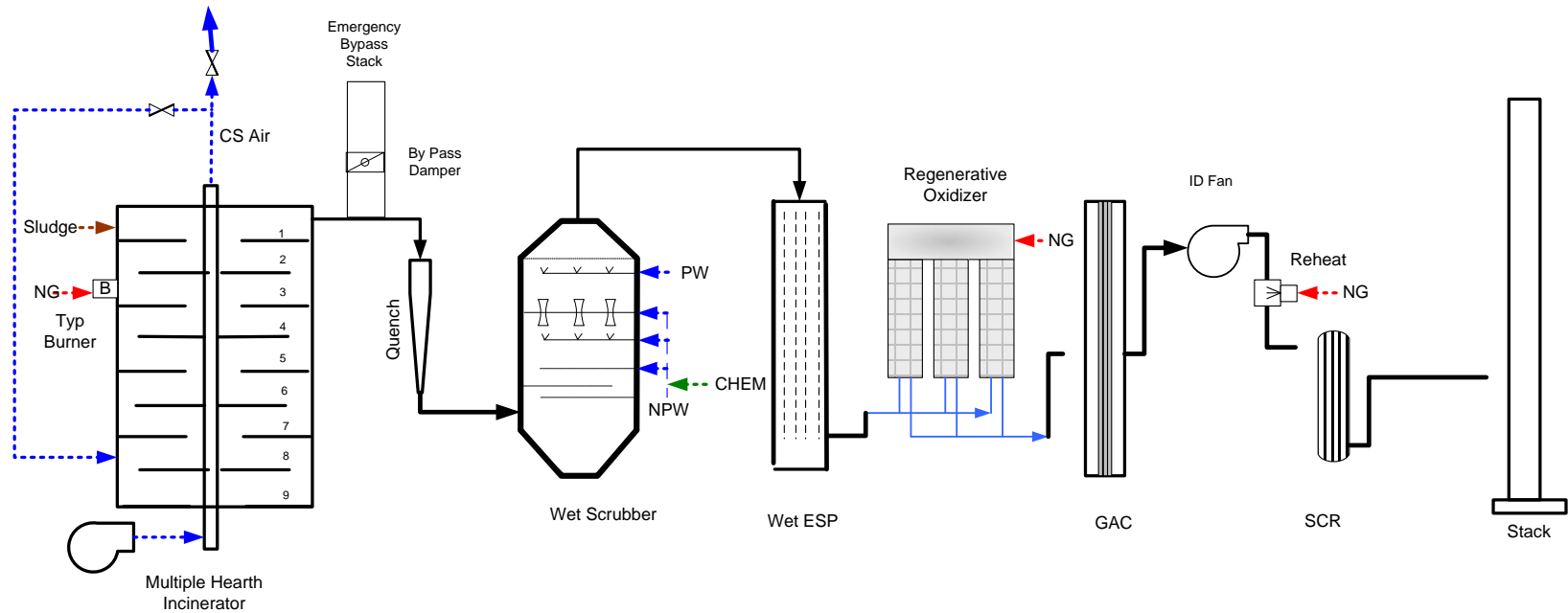
# Real Life Example of Agency with Five MH Facilities

Parameter @ 7% O <sub>2</sub>	129 limit	Plant				
		A	B	C	D	E
Cadmium (mg/dscm)	0.095	<b>0.11</b>	<b>0.06</b>	0.04	<b>0.07</b>	0.03
Dioxin/Furan, TMB (ng/dscm)	0.32					
Dioxin/Furan, TEQ (ng/dscm)	5.0	<b>11</b>			<b>9.5</b>	
CO(ppmv)	3,900	<b>3012</b>	2111	<b>2804</b>	1337	<b>3441</b>
HCl (ppmv)	1.0		0.10			
Mercury (mg/dscm)	0.02	<b>0.13</b>	<b>0.14</b>	<b>0.101</b>	<b>0.068</b>	<b>0.090</b>
NO <sub>x</sub> (ppmv)	210	<b>194</b>	128	<b>177</b>	<b>185</b>	<b>346</b>
Opacity, %	10					
Lead (mg/dscm)	0.3	<b>0.41</b>	0.07	<b>0.35</b>	<b>0.46</b>	0.09
PM, filterable (mg/dscm)	80	<b>83</b>	<b>78</b>	<b>65</b>	41	52
SO <sub>2</sub> (ppmv)	26					

# Initial Observations of Needs

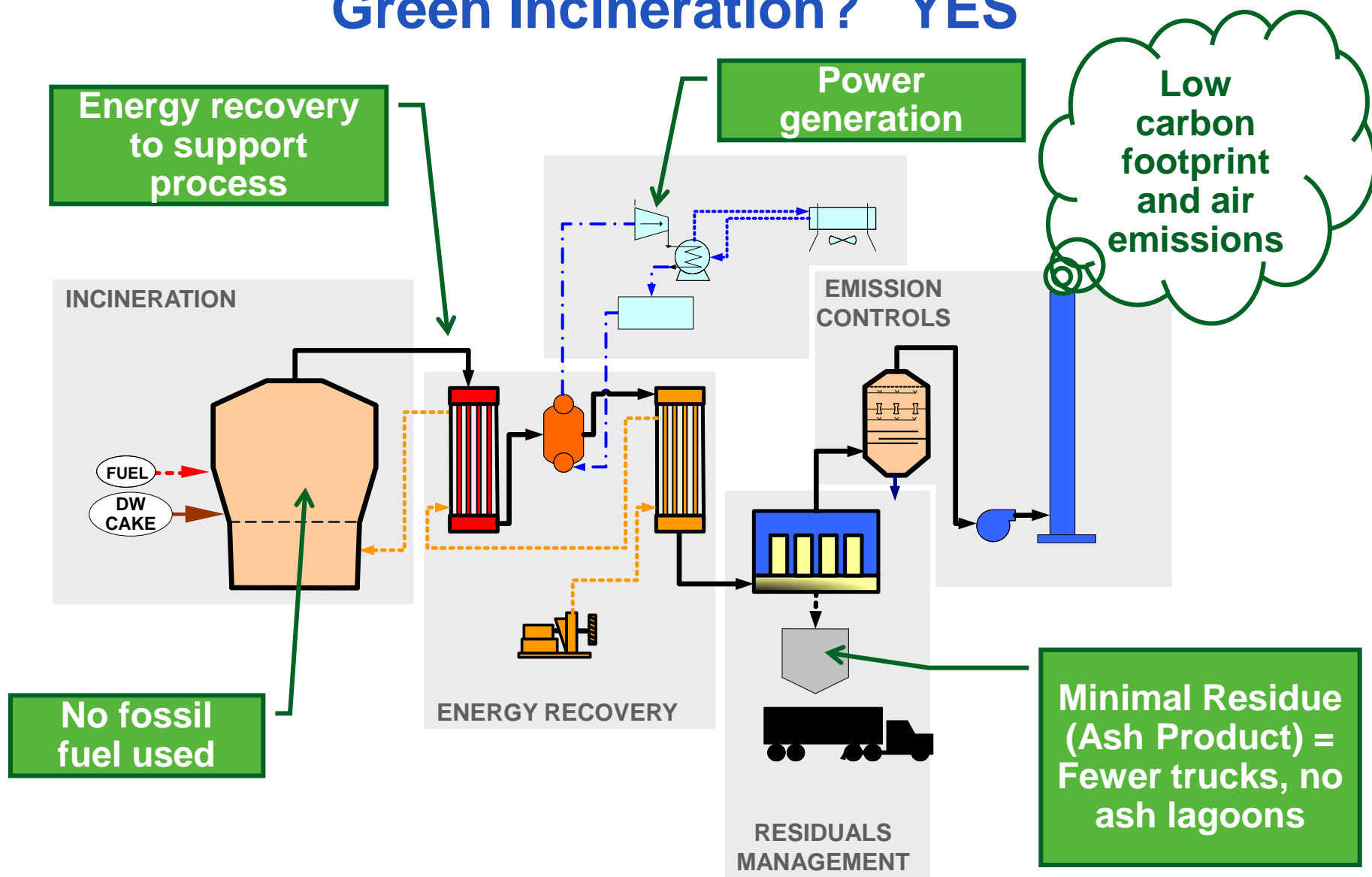
Plant	A	B	C	E	F
<b>Combustion Efficiency – may need afterburner and or NOx control</b>					
CO	Borderline	OK	OK	OK	Borderline
NOx	Borderline	OK	Borderline	Borderline	Control Req'd
Opacity	No data	No data	No data	No data	No data
<b>Particulate Control - may need better scrubber and/or WESP</b>					
Cd	Control Req'd	OK	OK	Borderline	OK
Pb	Control Req'd	OK	Control Req'd	Control Req'd	OK
PM	Control Req'd	Borderline	OK	OK	OK
<b>Wet Scrubber – may need to add caustic</b>					
HCL	No data	OK	No data	No data	No data
SO2	No data	No data	No data	No data	No data
<b>Carbon Adsorption - needed for control</b>					
D/F	Control Req'd	No data	No data	Control Req'd	No data
Hg	Control Req'd	Control Req'd	Control Req'd	Control Req'd	Control Req'd

# Multiple Hearth Incinerator on steroids...



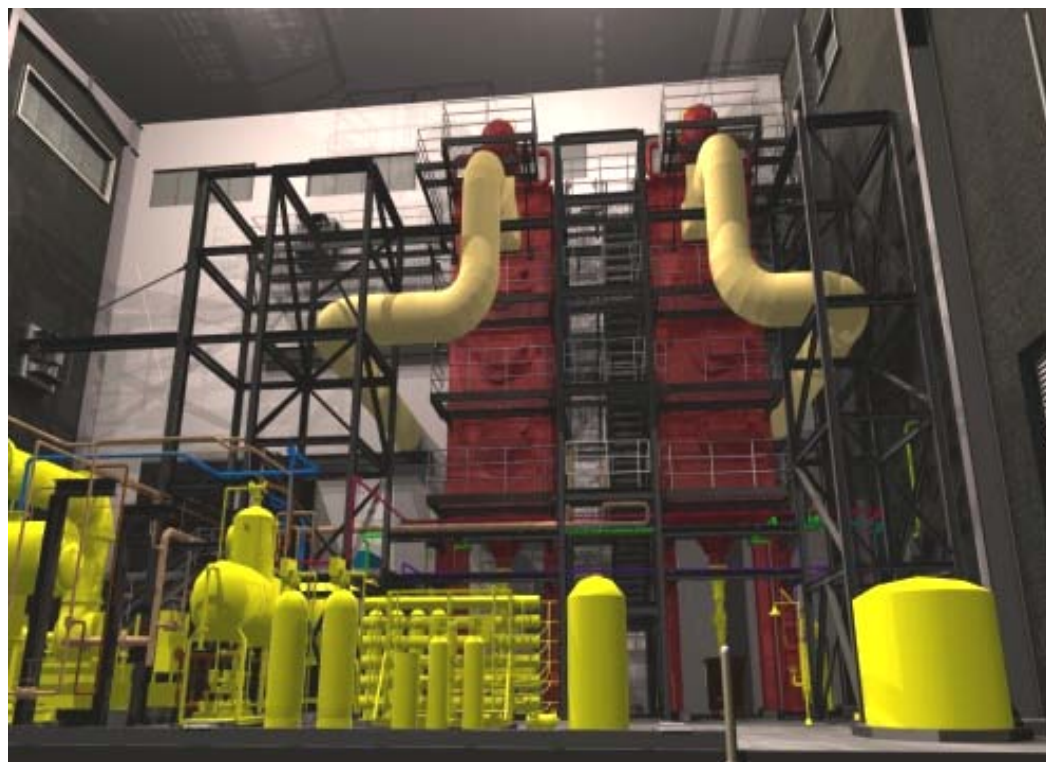
# Energy Production

# Green Incineration? YES



# Hartford, CT Decision – Add Energy Production to MHI Upgrade

- B&V designed MHI upgrade and power generation facility
- Waste heat boilers produce superheated steam at 600F which drives a steam turbine generator to produce electrical power
- Steam turbine generating output capacity will be 2 MW providing 45% of the current 3.5 MW plant demand



# NEORSD – Renewable energy production @ Southerly WWTP as part of upgrade to fluid bed

- Fluid bed incineration project was the most cost-effective biosolids management option
  - “Green power” system produces 27% of 13 MW plant load
  - Ability to use energy from grease/skimmings
  - Reduced natural gas consumption by \$1M/yr
  - Provided energy enhancement to offset purchased power
  - Minimize uncontrollable costs
  - Generate \$1.4 M/yr in electrical power to offset purchased power



# Facility Operations at Average Conditions

Parameter	Hartford	Southerly
No of Units Operating	2	2
Sludge Feed, dtpd	96	163
Total Solids, %	28	28
Volatile Solids	70	68
Auxiliary Fuel, Btu/h	6,200,00	0
Turbine Steam Flow, lb/h	24,100	26,000
<b>Gross Electricity Production, MW</b>	<b>1.6</b>	<b>2.6</b>
<b>Net Energy, kWh/dry ton</b>	<b>362</b>	<b>355</b>

# Paradigm Shift

## Recovering Energy as Resource

- Proposed regulations are driving us to consider energy as a resource for recovery
- Sustainability and public accountability are driving us to consider energy as a resource for recovery

**CHEERS... to the  
Northeast Ohio  
Regional Sewer District  
for installing generators  
at its Southerly  
Treatment Plant in  
Cuyahoga Heights that  
work more efficiently  
and will turn solid  
human waste into  
electrical power to help  
run the plant.**

**THE PLAIN DEALER  
August 22, 2008**

## Conclusions

- Incineration is a viable biosolids management option
- MACT standards will impact all facilities
- EPA is at least listening to our concerns
- Facilities should consider recovering energy as a resource

# Mill Creek Facilities

May 2008



July 2008



September 2008



November 2008



December 9, 2010

OWEA 2010 Biosolids Specialty Workshop

March 2009



September 2009



December 9, 2010

OWEA 2010 Biosolids Specialty Workshop

# NEORSD Facilities

# September 2010



# November 2010





# QUESTIONS

For more information...

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OWEA presents:

## 2010 Biosolids Specialty Workshop

December 9, 2010

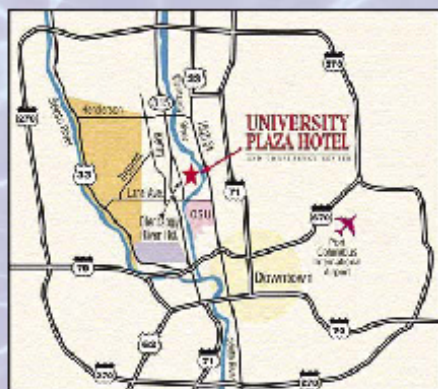


### University Plaza Hotel

Conveniently located in central Columbus  
 West of I-71 and along 315  
 North of OSU campus.

**University Plaza Hotel & Conference Center**  
 3110 Olentangy River Rd  
 Columbus, OH 43202  
 614.267.7461 Toll Free: 877.677.5292  
[www.universityplazaosu.com](http://www.universityplazaosu.com)

The conference rate is \$99/night (+ tax).  
 Request the "OWEA Specialty Workshop" rate.



### Workshop Schedule

- 7:45-8:15 **Registration, Coffee, and Pastries**
- 8:15-8:30 **Opening Remarks**  
 - *Jamie Gellner, Residuals Vice-Chair*
- 8:30-9:15 **Sludge Minimization – a Paradigm Shift in Sludge Management**  
 - *Dr. Sam Jejanayagam, CH2M Hill*
- 9:15-10:00 **Grit Collection and Classification Case Studies**  
 - *Brian McNamara, Hampton Roads Sanitation District*
- 10:00-10:15 **Break**
- 10:15-11:00 **LMI Mixing of Digester Tanks**  
 - *Brian Schultz, City of Sidney*
- 11:00-11:45 **Microconstituents in Biosolids - What Does It Mean for the Future of Land Application of Biosolids?**  
 - *Dr. Lakwinder Hundal, MWRD of Greater Chicago*
- 11:45-12:45 **Lunch (provided)**
- 12:45-1:30 **Dewatering Improvements - Clarksville Case Study**  
 - *Dan Miklos, Hazen and Sawyer*
- 1:30-2:15 **Update on Solid Waste Rule for Incinerators**  
 - *Jim Welp, Black & Veatch*
- 2:15-2:30 **Break**
- 2:30-3:15 **Energy Conservation and Recovery in Wastewater Treatment Facilities**  
 - *Jim Smith, Malcolm Pirnie, Inc.*
- 3:15-4:00 **Basics of Aerobic Stabilization**  
 - *Bryen Woo, Ovivo*
- 4:00 **Adjourn**

### 2010 Biosolids Specialty Workshop

Thursday, December 9, 2010

#### Register Online at [ohiowea.org](http://ohiowea.org)

If unable to register online,  
 complete below and mail or fax to OWEA,  
 or register via telephone by calling 614.488.5800.

Registration Fee	
Member:	<input type="checkbox"/> \$100
Enter OWEA/WEF #	
Non-Member:	<input type="checkbox"/> \$150
<input type="checkbox"/> I have read & agree to the OWEA refund policy	
Badge Name:	
Company:	
Address:	
Email:	
Phone:	
Method of Payment	
Check #	<input type="checkbox"/>
P. O. #	<input type="checkbox"/>
Credit Card:	<input type="checkbox"/>
If you select credit card, you will be emailed a secure link to enter your credit card payment. Be sure to enter a valid email address. Or you may call the OWEA office with your credit card number.	

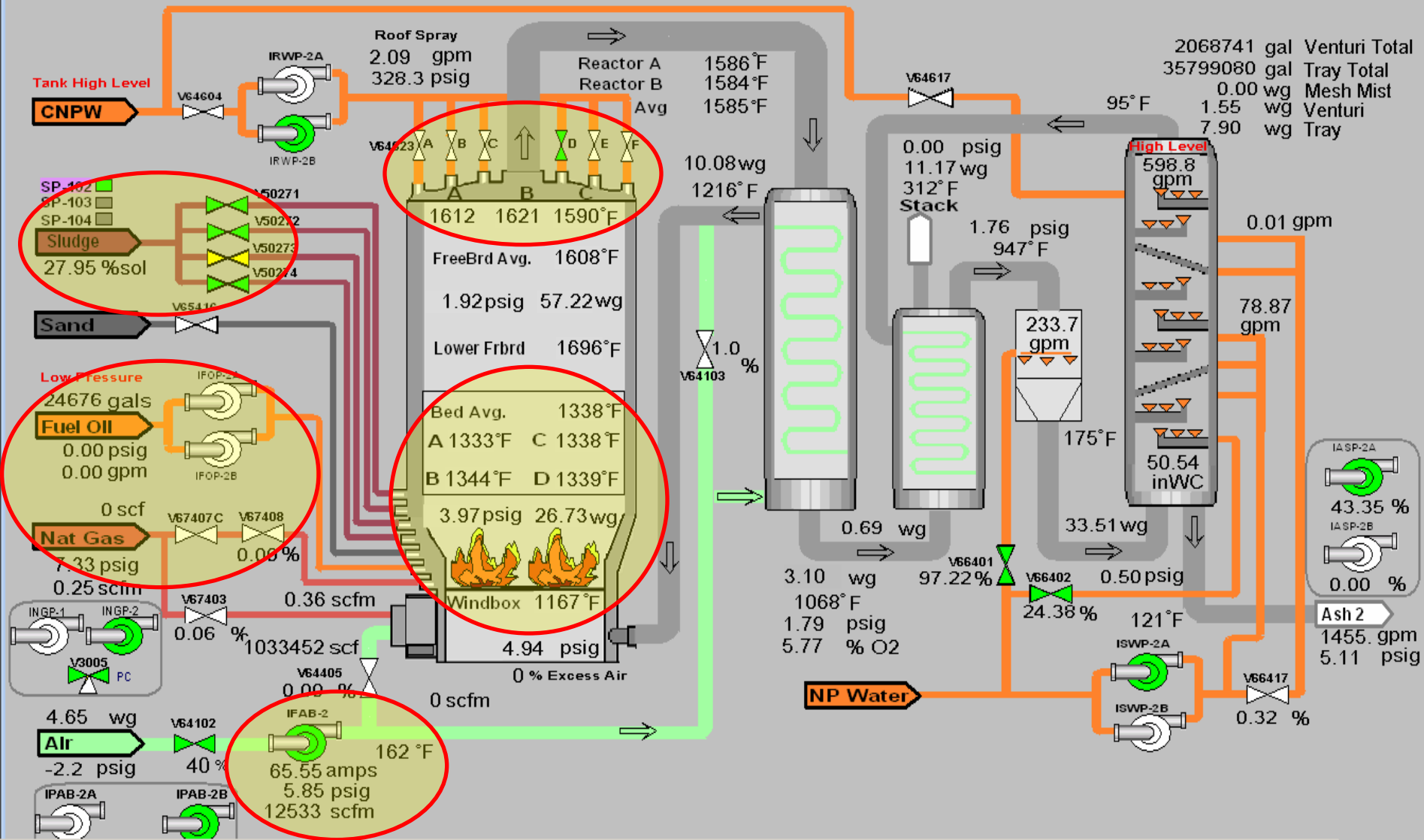
Mail to: OWEA  
 1890 Northwest Blvd, Suite 210  
 Columbus, OH 43212

Phone: 614.488.5800 Fax: 614.488.5801  
 E-mail: [info@ohiowea.org](mailto:info@ohiowea.org)

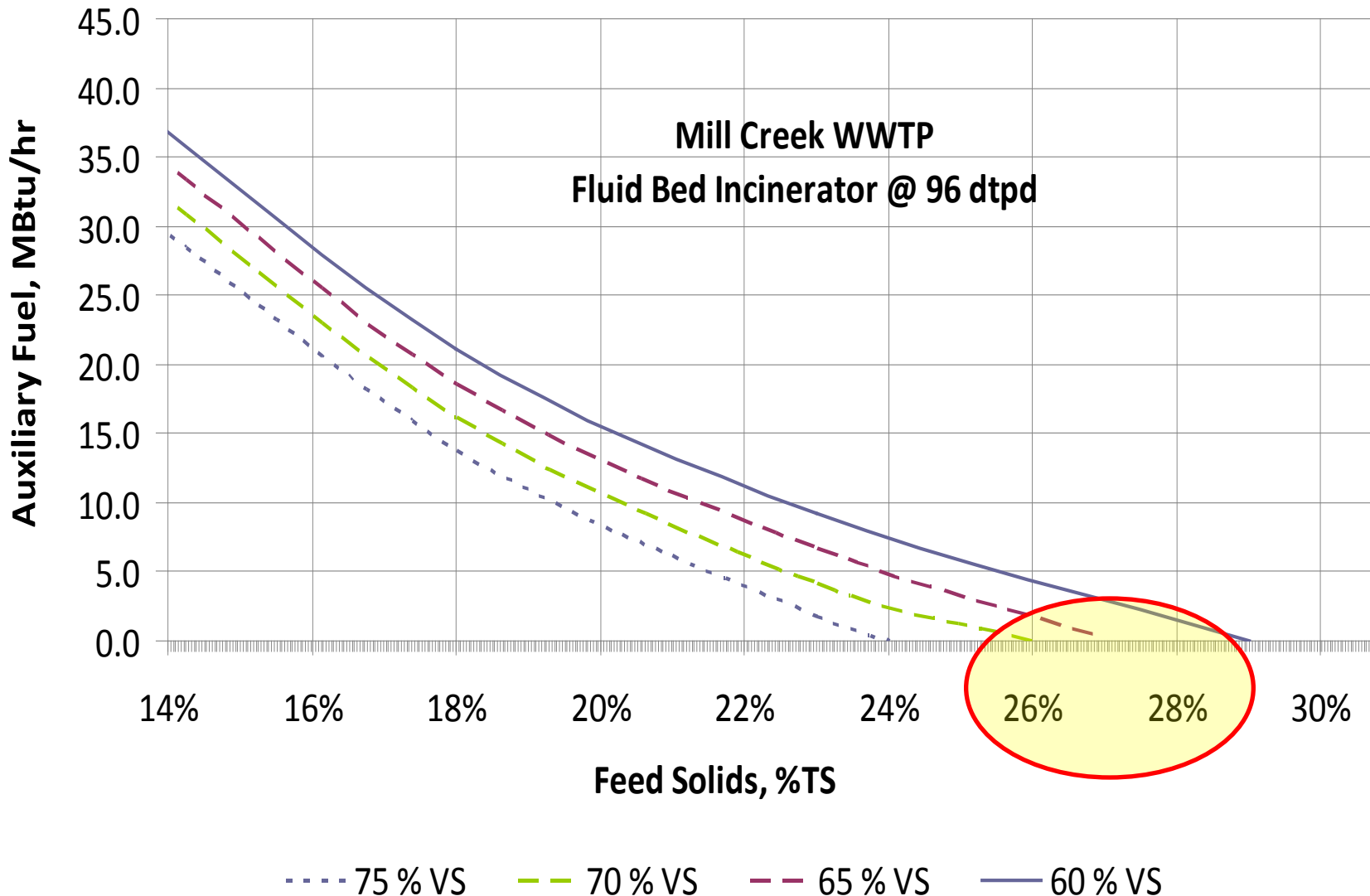
**Registration will be confirmed by E-mail.**

# Mill Creek WWTP Incineration Process

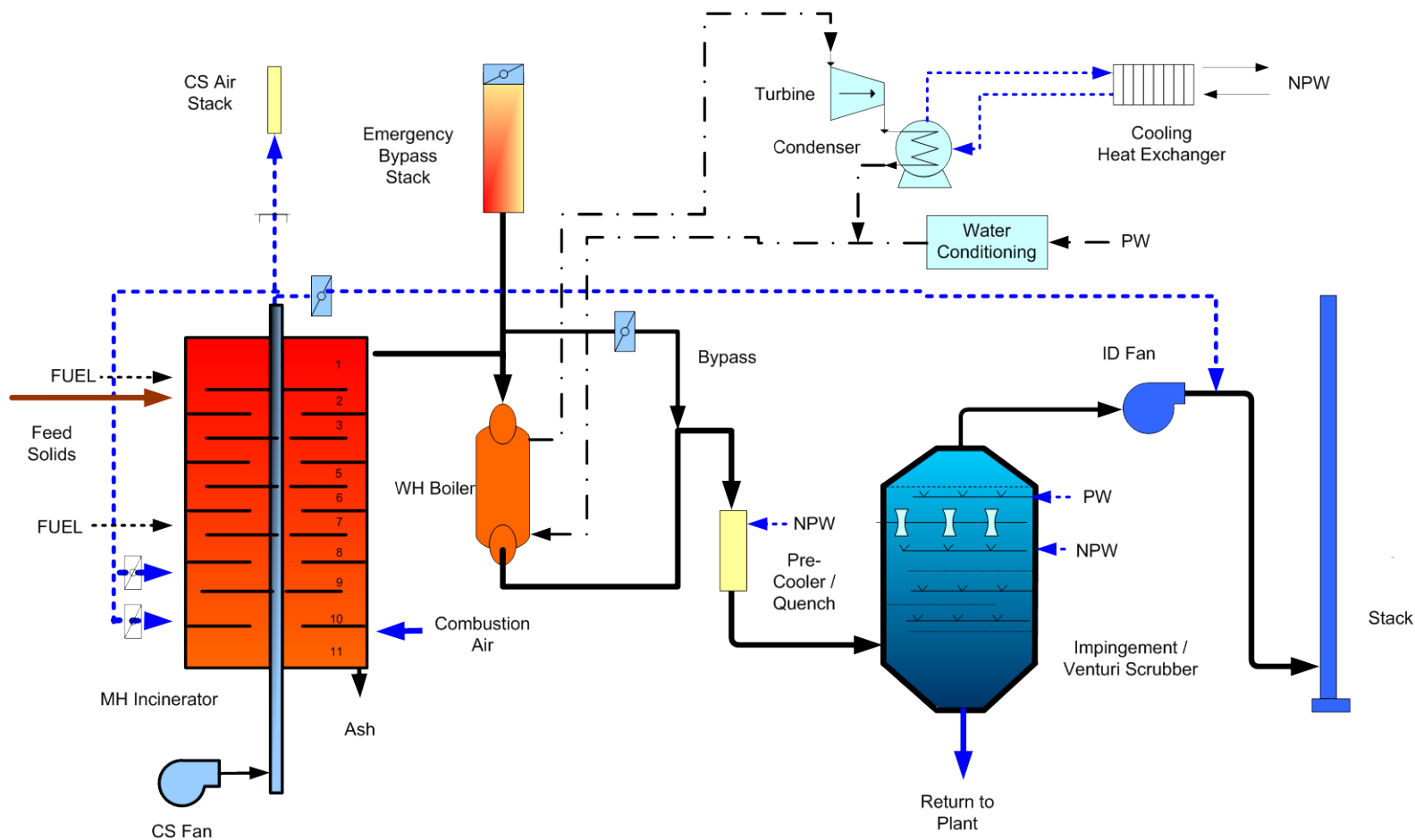
Incinerator 2 System Overview



# Auxiliary Fuel Requirements with Hot Windbox



# Hartford WPCF Power Generation Schematic



# Southerly WWTP Power Generation Schematic

