CONSEQUENCES OF A RCRA DESIGNATION FOR BIOSLUDGE

- **Biosludge management in tank trucks is subject to RCRA container standards, inspections and recordkeeping requirements**
- **Biosludge combustion is subject to extensive RCRA management requirements, recordkeeping and permitting.**

CONSEQUENCES OF A RCRA DESIGNATION FOR BIOSLUDGE

- Uncertainty in RCRA requirements for 340 ton/day waste stream
  - Biosludge dewatering processes are dependent on the wastewater treatment tank exclusion.
  - Bevill Exclusion concerns affecting 31,000 tons of coal ash management
  - Limits flexibility in evaluating other waste management options
    - Gasification
    - Beneficial Use Opportunities
    - Severe Testing limitations

Annual Operating Costs Associated with RCRA BIF Units

1. Additional equivalent personnel $500,000
   a. 2 technical support personnel in powerhouse
   b. 2 environmental instrument analysts/systems personnel
   c. 1 dedicated Environmental Affairs support person
2. Low metals coal premium $250,000 - 500,000
3. Low metals analyses $150,000
4. Bevill test cost for outside analyses $ 10,000

Annual Operating Costs Associated with RCRA BIF Units

5.	Systems materials maintenance	$ 5,000
6.	Continuous Emissions Monitors maintenance materials	$ 60,000
7.	In-house weekly & daily sludge analyses	$ 30,000
8.	COC Testing	$ 100,000
TOTAL ANNUAL COST		$1,105,000 - 1,355,000

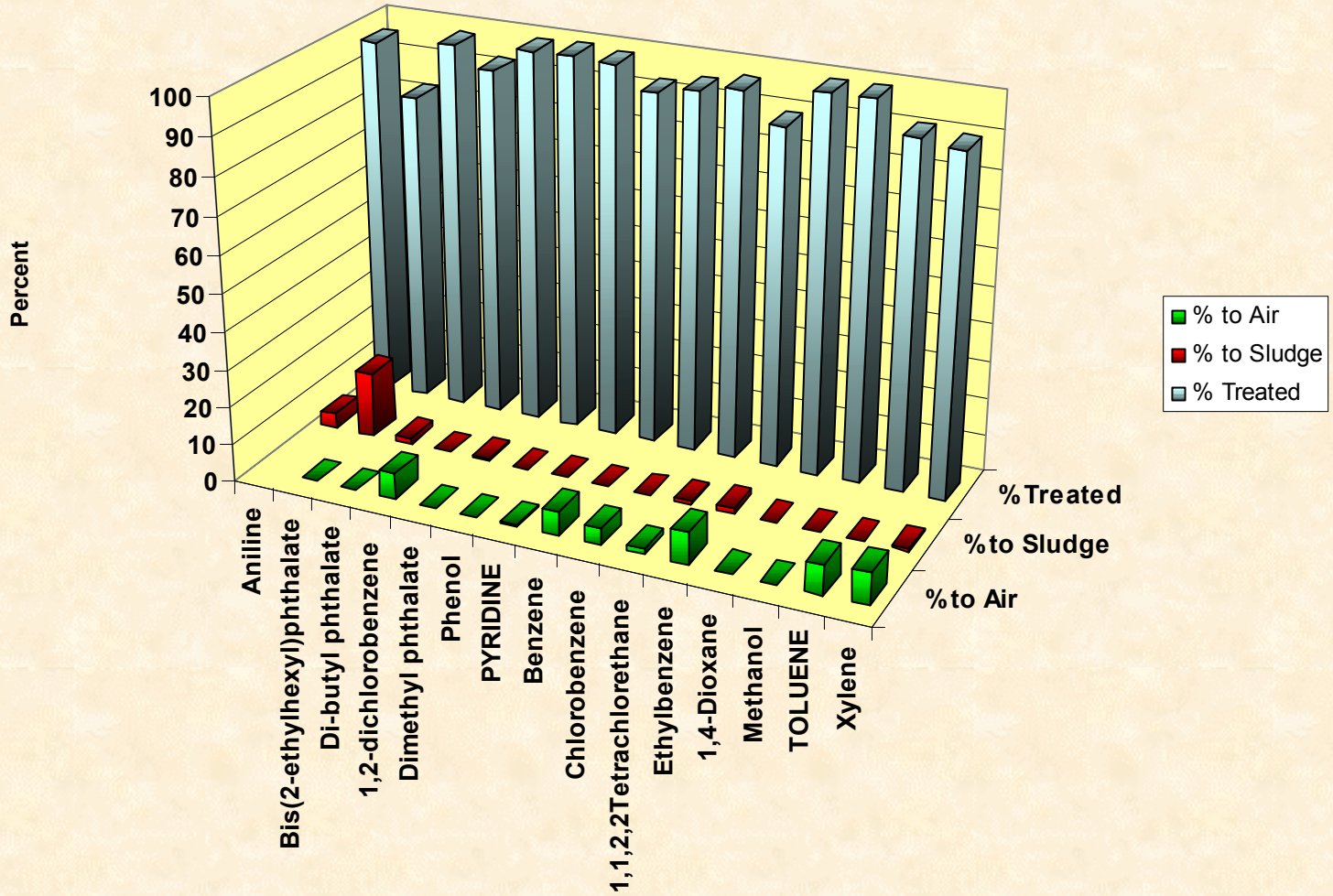
Remaining Costs for RCRA Permitting of BIF Units

• Risk Assessment data collection for 7 BIF units (3 sets of Risk Burns)	• $500,000
• Trial Burns for 7 BIF units (6 sets of Trial Burns)	• $700,000
• Risk and Trial Burn data evaluation and submittal, risk analyses, establishing operation conditions and permit negotiation	• $500,000
• Permitting Fees (proposed)	• $150,000

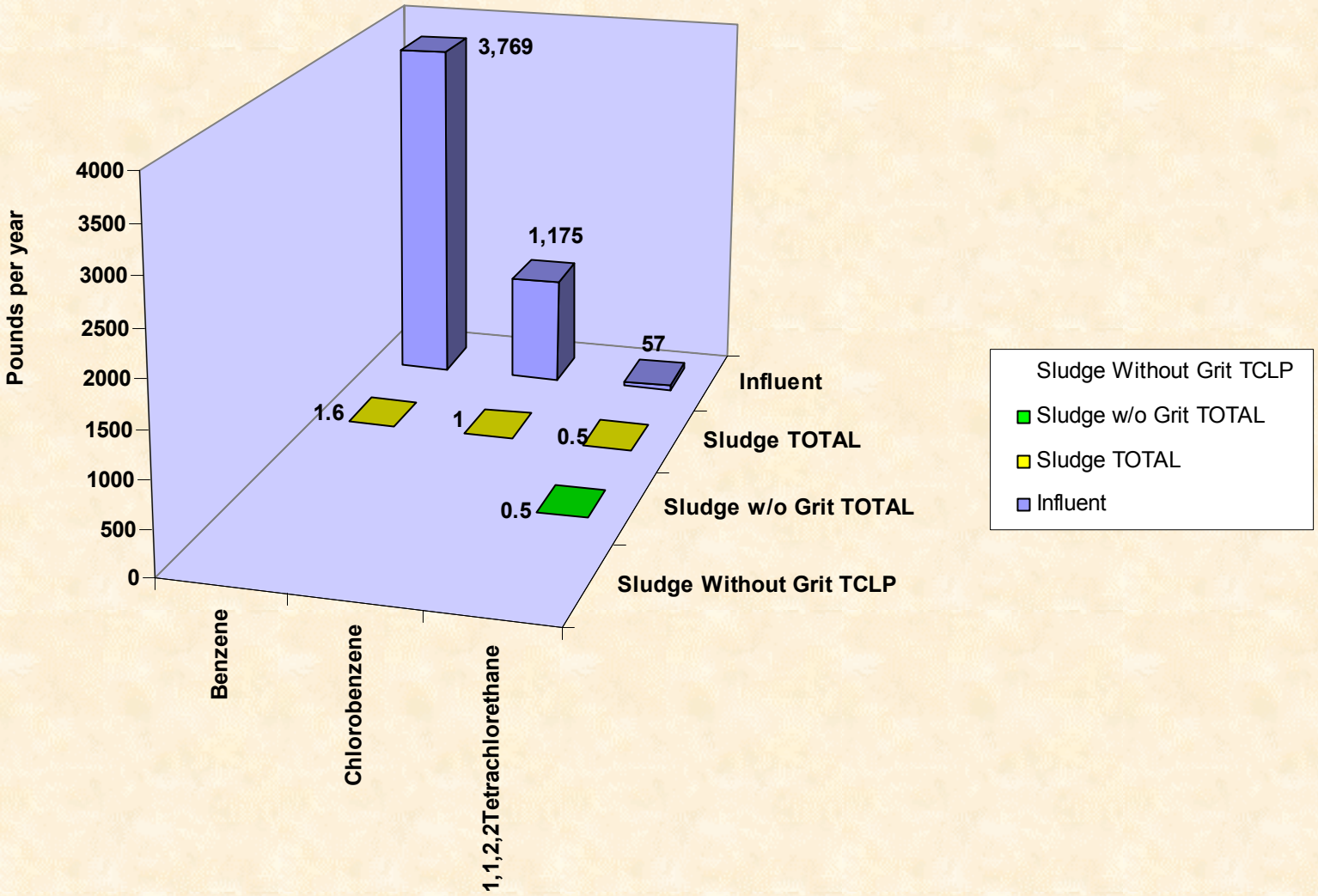
Projected Compliance Cost for BIF MACT

- Installation of new APC equipment on 4 boilers
- $61,000,000
- Annual increased operating costs
- $3,000,000

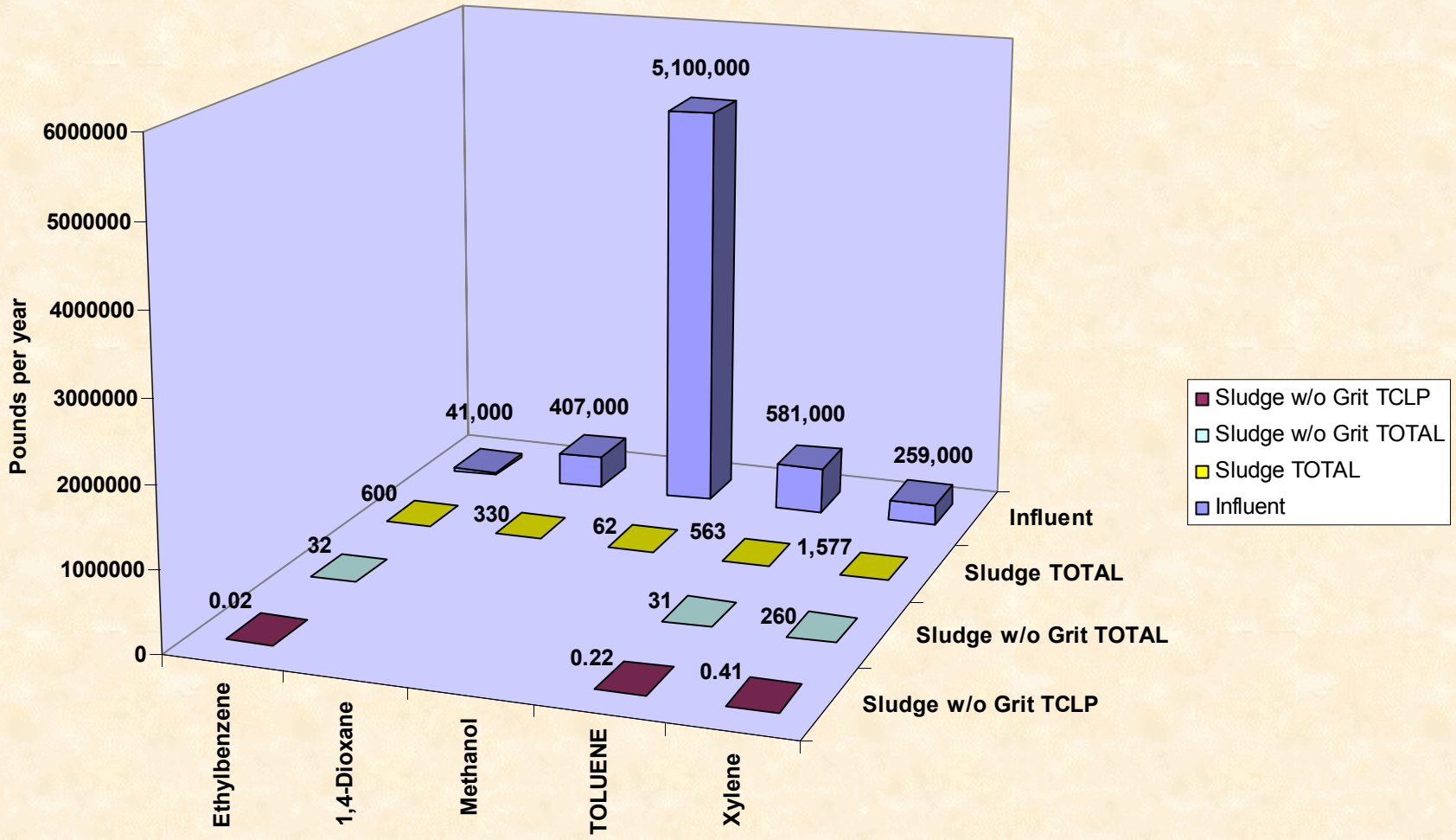
Summary Chart - Removal Efficiency



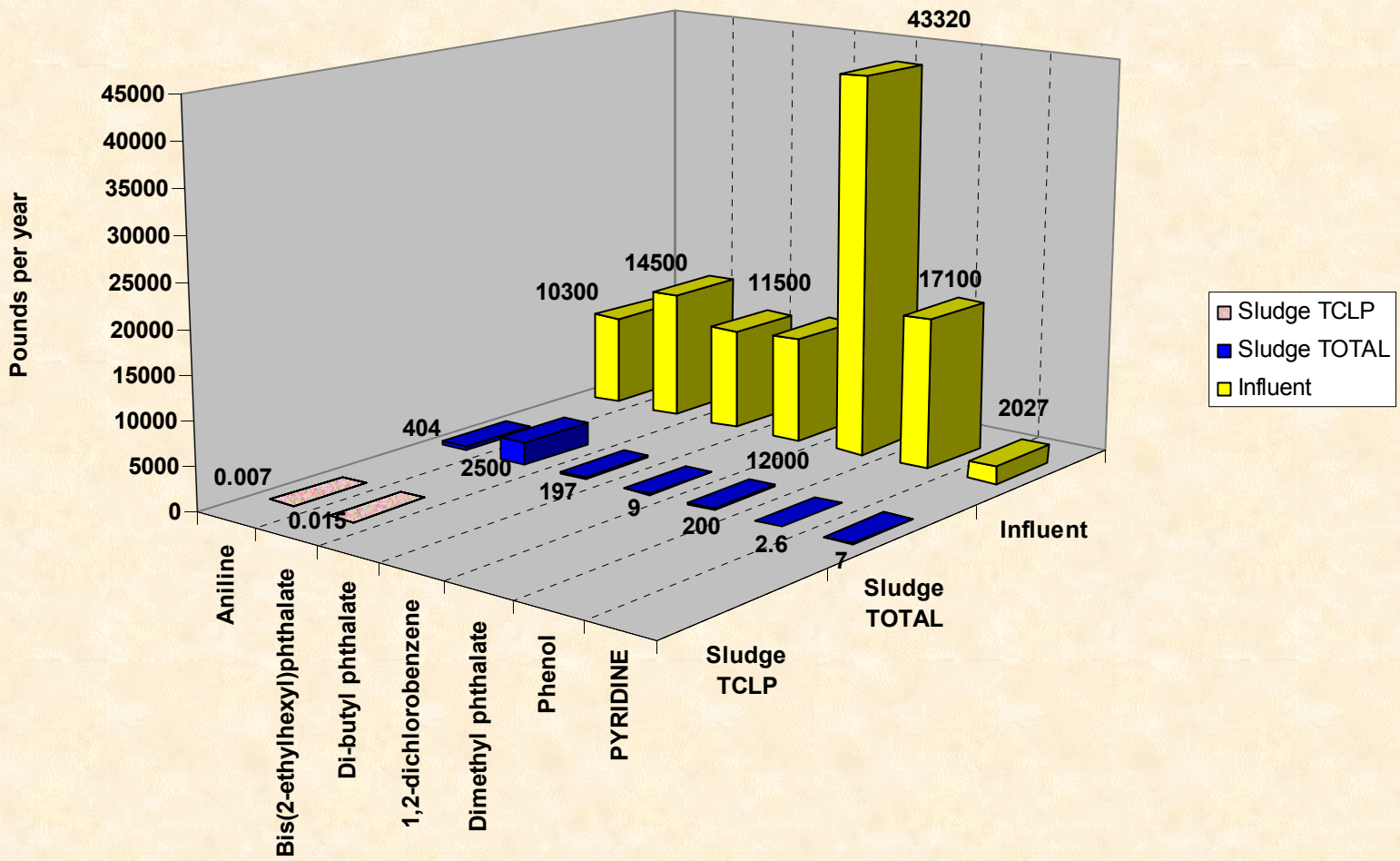
Volatile Organics Chart 1



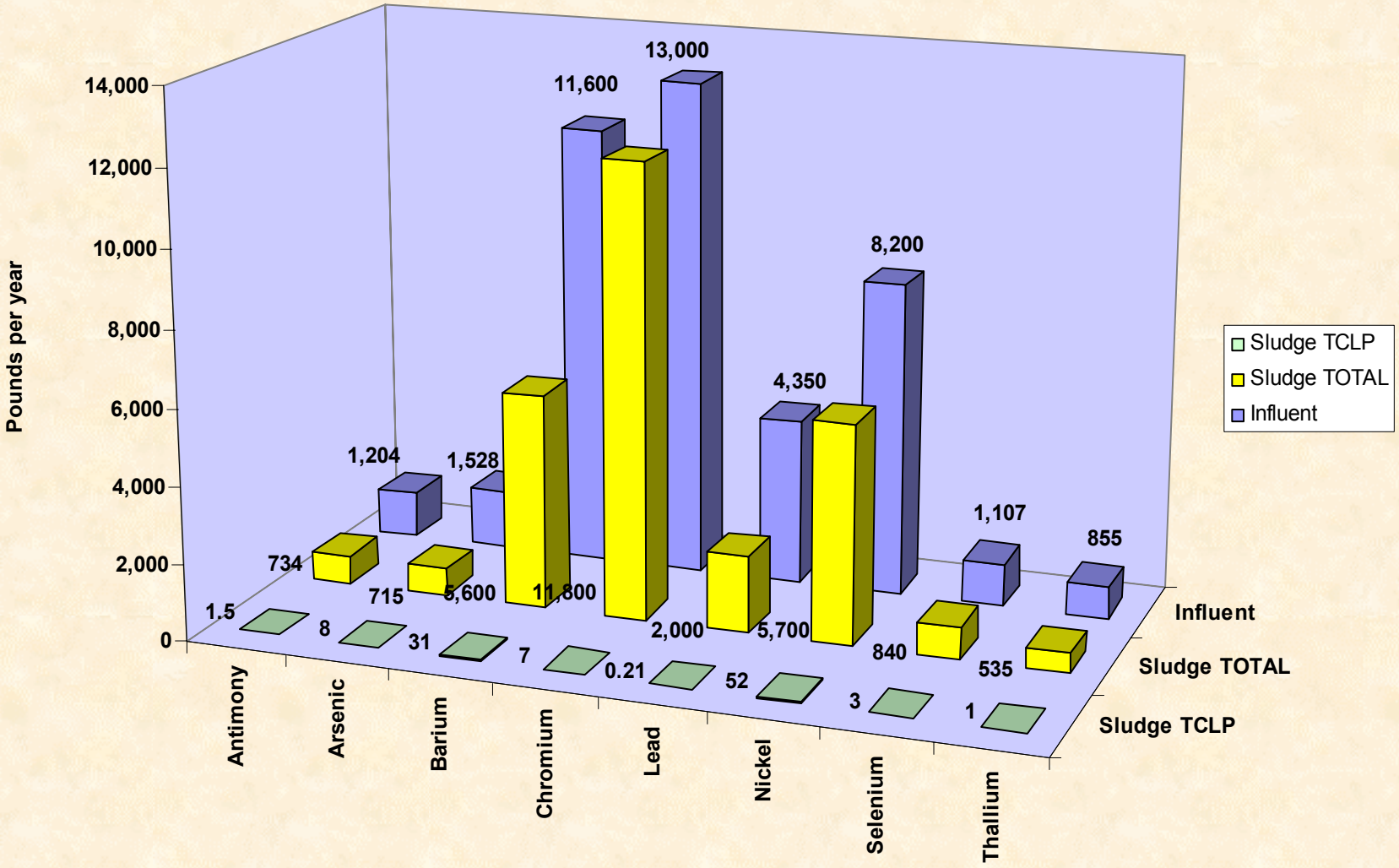
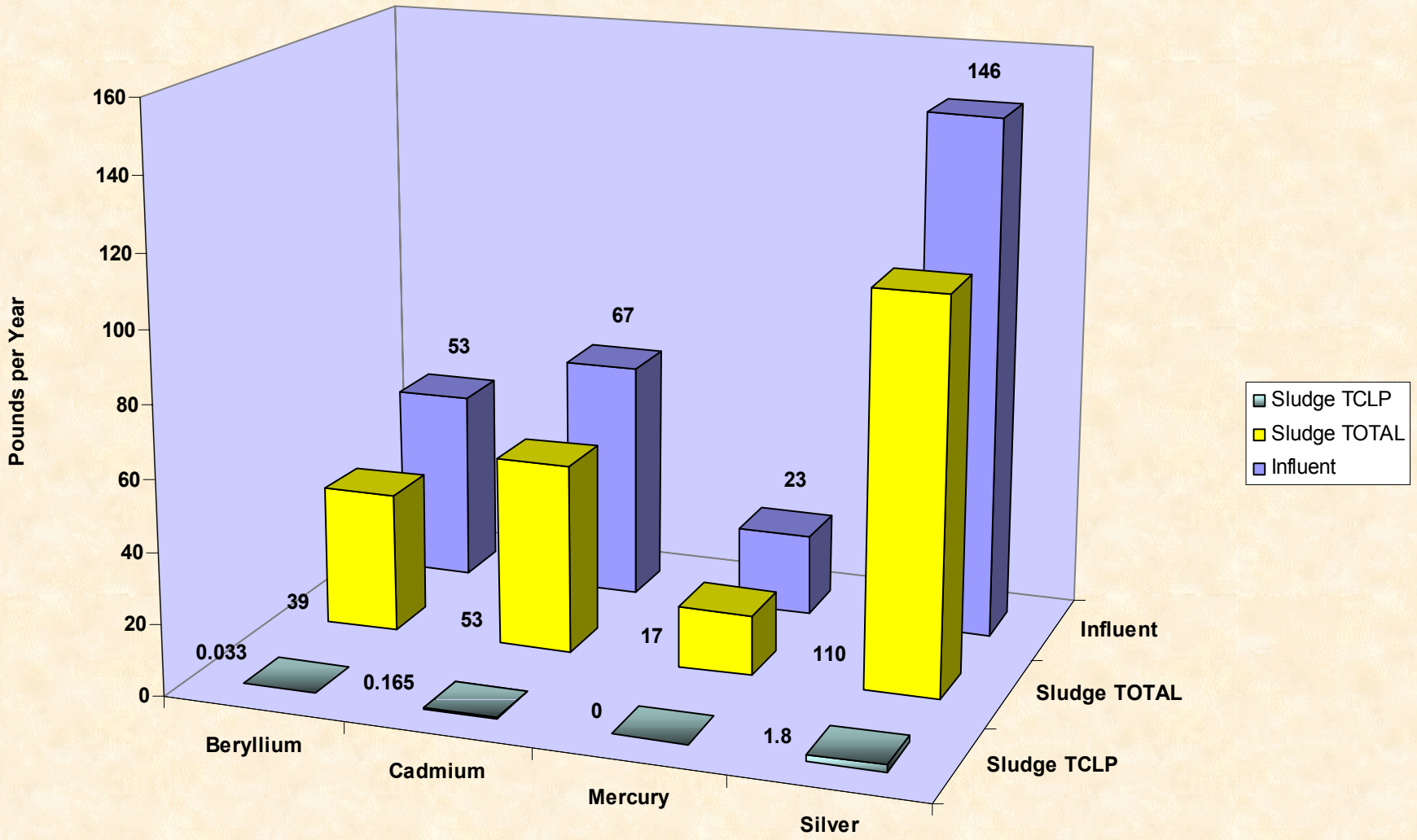
Volatile Organics Chart 2



Semi-Volatile Chart



Metals Chart 1



Metals Chart 2