ENGINEERING ANALYSIS

CITY OF GADSDEN AIR CURTAIN INCINERATOR FACILITY NO. 307-0054-X001

Applications for an Air Permit were received from the City of Gadsen for installation of an Air Curtain Incinerator (ACI) located at 111 Burnsway Drive in Gadsden. A permit fee of \$7,185.00 has been assessed. A Greenfield site inspection was conducted on February 18, 2025, and no problem areas were noted. A 15 day public comment period will be required.

This facility will be subject to 40 CFR Part 60 Subpart EEEE – Standards of Performance for Other Solid Waste Incineration Units. This facility which incinerates 100% wood waste, 100% clean lumber, or 100% mixture of wood waste, clean lumber, and/or yard waste, will be required to meet the New Source Performance Standards (NSPS) visible emission limit of 10% opacity and an opacity limitation of 35% during the start-up period that is within the first 30 minutes of operation. In order to determine initial compliance with the NSPS for new facilities, a Method 9 Visible Emission Observation will be required within 180 days of startup. After the initial test for opacity, an annual test must be conducted no more than 12 months following the date of the previous test.

This facility may operate five days per week. See provisos eight (8) and nine (9) regarding the hours of operation.

The ACI will be 30'2" long, 8'1" deep and 8'5" wide. The ACI will be equipped with overfire air blowers and will have refractory panel walls. The unit conforms to the specifications required by the Department.

I recommend that Air Permit No. 307-0054-X001 for the Air Curtain Incinerator be issued with the attached provisos.

Catrice Lamar Energy Branch Air Division

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