



Alabama
Department of Environmental Management

AIR PERMIT

PERMITTEE: CITY OF GADSDEN
FACILITY NAME: GADSDEN CONSTRUCTION/DEMOLITION LANDFILL
LOCATION: GADSDEN, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE, OR DEVICE
307-0054-X001	AIR CURTAIN INCINERATOR

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT

**CITY OF GADSDEN – AIR CURTAIN INCINERATOR
GADSDEN, ALABAMA
(AIR PERMIT NO. 307-0054-X001)**

PROVISOS FOR AIR CURTAIN INCINERATORS

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.
4. Each operator shall be trained in the proper operation and maintenance of the air curtain incinerator.
5. An operator must be present at the air curtain incinerator at all times while it is in use.
6. The air curtain incinerator is authorized to burn untreated wood and vegetation, including leaves in plastic bags. Prohibited material includes, but is not limited to, rubber and asphalt products, paper, cardboard, plastics (except for bags of leaves), sludge, soil, garbage, any oil except light fuel used to ignite the material at start-up, medical waste, insulation, paint, solvents, furniture, bedding, appliances, salvable materials, animal carcasses, more than 10% sawdust or bark or wood chips per charge, wood coated with lead paint, non-wood floor coverings, clothing, and non-wood components of any equipment.
7. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.
8. The material in the air curtain incinerator may be ignited and burning may commence no earlier than one hour after sunrise.
9. Loading of material should be discontinued at least one hour before the scheduled shutdown of the unit. No fuel may be added to the unit later than one hour before sunset. Following the last charge, the unit must be operated until no smoke is visible for five minutes after the fan is shut down. If smoke is visible, the fan must be restarted until the previous condition can be met.

10. Ignition is not authorized during precipitation.
11. Cold or hot ignition is authorized. For cold starts, no fuel heavier than diesel fuel may be used, a maximum of 1/2 gallon. For hot starts, coals may be banked overnight, provided they meet the no visible emissions requirement.
12. During ignition, the unit shall not be loaded more than one-third full. After the material is burning, the overfire air must be on.
13. The owner/operator must perfect loading techniques to minimize visible emissions (smoke). For example, fuels which when added produce a large amount of smoke (such as bags of leaves) should be rapidly covered with light, dry fuel such as brush or branches. Alternate charges between heavy and light materials. Charge the material toward the rear of the unit.
14. The air curtain incinerator shall not be loaded such that any material protrudes above the air curtain.
15. Overfire air must be used.
16. The air curtain incinerator must be operated with the doors securely closed. It may not be operated if breaks are present in the integrity of the walls (including doors not securely closed) due to loading, wear or warping. It may be restarted after the breaks are repaired.
17. The burn chamber must be cleaned out when the depth of the ash reaches one-third the distance to the top of the unit. Before ashes are removed from the unit, they should be wetted to reduce dust and to cool any hot embers.
18. Ash must be disposed of at a landfill permitted by this Department, or at a site authorized by the Land Division. This special authorization must be in writing.
19. Methods must be established to minimize fugitive emissions during ash handling. Ash being transported must be covered completely enough to prevent any visible emissions.
20. The elevation of the burn chamber floor must not deviate more than one inch from its elevation when it received Departmental approval.
21. The air curtain incinerator shall be maintained in good operating condition. The incinerator shall be checked for cracks and repaired as necessary to maintain good airflow. All fans shall be maintained in proper operating condition. The refractory lining shall be maintained and cracks repaired as necessary to maintain the structural integrity of the unit.
22. Open burning of any material at this facility, except in the air curtain incinerator, is prohibited.
23. This facility is subject to New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart EEEE. This limits opacity emissions to 10% as measured by an EPA Reference

Method 9 (6-minute average). The opacity limitation is 35% (6-minute average) during the start-up period that is within the first 30 minutes of operation.

24. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (b) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 15 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

25. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing permitted activity.
26. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
27. Should this facility, at any time, exceed the limits set forth in this permit, this Department must be notified within ten (10) days of the exceedance.

DATE: DRAFT