

Waste Not

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CALIFORNIA: FOSTER WHEELER'S 330 TPD MASS-BURN INCINERATOR IN COMMERCE DENIED "PERMIT TO OPERATE" ON JANUARY 27, 1989: PART 1. The Commerce incinerator began operating in February 1987 and is fitted with the latest air pollution control devices. The Commerce incinerator has been held up as a model facility by its designers, **Foster Wheeler**. The California South Coast Air Quality Management District (**AQMD**) denied the Commerce-to-Energy Authority (**CREA**) its "permit to operate" for failure to have a certified CO Continuous Emission Monitoring System and for failure to submit a Health Risk Assessment. The Commerce incinerator burns 95% commercial waste and 5% residential waste. Though **CREA's** "permit to operate" has been denied, the incinerator is still burning while **CREA** pleads its case for a variance until it is in compliance. **CREA's** project manager Michael W. Selma appealed for a variance on 12-19-88 to the **AQMD** on the grounds that if the incinerator is shut down "it will cause a severe financial hardship for the Los Angeles County Sanitation District and the City of Commerce." In Commerce, according to our correspondent Will Baca, who has compiled a summary of emission data, there have been many problems. According to Will, "It's the difference between theory and practice. The data is hard and convincing: it proves you can't operate one of these facilities as you proposed." The following highlights what was proposed versus what is taking place.

AQMD = CALIFORNIA SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (Regulatory agency)
CREA = COMMERCE-TO-ENERGY AUTHORITY (Operators of the incinerator)

THEORY

PRACTICE

Before the incinerator went on line **CREA** projected that the ash would not fail the California state toxic standards based on their analysis of the waste stream.

From March 1987 to September 1988 (latest figures available) the ash failed the California toxic standards for **lead 81% of the time. Cadmium failed 38% of the time.** (see charts in Part 2).

PERMIT TO CONSTRUCT GRANTED JUNE 6, 1985: AIR EMISSIONS NOT TO EXCEED

SOX - 9 lbs per hour

CO - 18 lbs per hour

NOX - 41 lbs per hour

IN THE 35 DAY PERIOD FROM OCTOBER 27 TO NOVEMBER 30, 1988, TEST RESULTS SHOWED 21 days over the limit. SOX emissions were measured at nearly 60 lbs/hr on 11-17-88. 19 days over the limit. CO emissions were measured at over 35 lbs/hr on 11-7. 4 days over the limit. NOX emissions were measured at 60 lbs/hr on 11-13-88.

The **AQMD** "Permit to Construct" granted June 6, 1985, stated: "A continuous carbon monoxide monitor and recorder must be installed, maintained in good working condition and operated to measure concentrations in the exhaust stack."

The **AQMD** has denied **CREA** its "permit to operate" on the basis that the CO monitor has not worked to precision standards for nearly 2 years. **CREA** as a last resort has offered to replace the CO monitor. It has not done so as yet.

The **AQMD** required **CREA** to submit a Health Risk Assessment (**HRA**) in its 6-6-85 "Permit to Construct."

CREA has not submitted a **HRA**. Both the **AQMD** and **CREA** ran side-by-side, independent parallel emission tests. The **AQMD** test results were 5 to 10 times higher for dioxin and metals than **CREA's**. Technical arguments have delayed the **HRA** because the **AQMD** and **CREA** could not agree on what numbers to use.

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THEORY

PRACTICE

The permit applications described the **Foster Wheeler** incinerator as a 330 tpd capacity incinerator.

The incinerator burns on average 350 tpd and it has burned as much as 480 tpd. If it operated at the "330 tpd capacity" it would not produce the 115,000 per hour of steam needed. Instead of producing less steam **CREA** burns more waste.

CREA estimated 5,900 to 6,250 BTU's per lb/hr in the permit application.

The incinerator is getting approx. 5,000 BTU's per lb/hr.

In the "Permit to Construct" it was stated that the use of natural gas be confined to start-up and shut-downs.

In 1987 **CREA** used natural gas quite liberally. In 1988 **CREA** significantly cut back on the use of natural gas. As the incinerator has a **single boiler**, **CREA** has no flexibility or capability to react to operational problems. They resort to burning gas to maintain the power while repairing operational problems no matter how minor they may be. Even the smallest problem can force them down and they use natural gas just to keep running. They cannot afford to shut down.

Southern California Edison, the electric utility, pays **CREA** 9 1/2¢ to 14¢ a kilowatt hour.

Current cost in southern Calif. is 2 1/2¢ per kilowatt hour. 70% of **CREA's** revenues come from power subsidies. The energy payments from power are a function of how reliable power production is. **CREA** gets incentive pay for producing power continuously and that is the motivation for them to keep facility at maximum continuous power, i.e., the justifications for burning more waste and for using excess natural gas.

PUG MILL. Blends water with fly ash to create a slurry so fly ash doesn't fly around. The pug mill prevents fugitive dust from spreading throughout the plant. According to "Permit to Construct":

"Equipment must be properly maintained and kept in good operating condition at all times."

The pug mill never worked properly so **CREA** doesn't use it. The **AQMD** has jurisdiction over the ash handling system but their enforcement arm doesn't enforce. (The state **OSHA**, which enforces workplace standards, was disbanded by the Calif. Governor in 1986. In the Nov. 1988 elections the Calif. **OSHA** was re-established.) The **AQMD** spent 3 weeks on dioxin testing in the summer of 1988. The **AQMD** parked a white mobil van on **CREA's** property. At the end of the 3 weeks the white van was grey from the settling ash.

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