

A Template for Self-Implementing a Non-Waste Determination Under the Non-Hazardous Secondary Materials (NHSM) Rule

**Presented to the AF&PA, NCASI AND AWC BOILER MACT WORKSHOP
by All4 Inc.**

Dan Holland | dholland@all4inc.com | 610-933-5246 ext 15

March 13, 2013



www.all4inc.com

Kimberton, PA | 610.933.5246

Columbus, GA | 706.221.7688

A Typical Scenario

- ❑ Alternate Fuel Supplied by Third Party Vendor
- ❑ Biomass Component
- ❑ Post Consumer Component

How Do I Document My NHSM?

- ❑ DIY
- ❑ Vendor
- ❑ Third-Party Consultant

Documentation Includes

- ❑ Sufficient Processing of NHSM
- ❑ Demonstrating Legitimacy Criteria are Met

NHSM Non-Waste Legitimacy Criteria

- ❑ Managed as a Valuable Commodity
- ❑ Meaningful Heat Content
- ❑ Comparable Contaminant Levels

Engineered Fuel with Specifications for

- ❑ BTU Content
- ❑ Sizing
- ❑ Moisture Level
- ❑ Minimal Dusting
- ❑ Metals Removal

HAPs, HAP Precursors Testing

- ❑ Include What You Know to be There
- ❑ Exclude What You Know Not to be There

Homogeneous Nature of NHSM

- ❑ Amount of Sampling Required
- ❑ Data In Lieu of Sampling (Fuel Vendor's Information)

Boiler MACT Recordkeeping

- ❑ Documentation of the NHSM Processing (required)
- ❑ Documentation of Legitimacy Criteria (suggested)
- ❑ Documentation of Changes to NHSM (suggested)

Costs for Self Determinations

- ❑ Analytical Costs \$1,500 for 70 Contaminants
- ❑ Third-Party Preparation Budget \$17,500

Timeline to Complete a Self Determination

- ❑ 4-6 weeks To Build the Demonstration
- ❑ 2-4 weeks for Analytical Results
- ❑ Comfort Letters Take 6-12 Months

Self Determinations are in Your File Cabinet

- ❑ “...persons who burn NHSM are ultimately responsible.”

1054 Days and Counting

(it's a Sunday by the way)

Dan Holland | dholland@all4inc.com | 610-933-5246 ext 15

March 13, 2013



www.all4inc.com

Kimberton, PA | 610.933.5246

Columbus, GA | 706.221.7688