

## STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Air Pollution Control 9<sup>th</sup> Floor L & C Annex 401 Church Street Nashville, Tennessee 37243-1531

October 11, 2012

Mr. C. Donald Evans, PhD, PE Environmental Design Services Inc. 113 Canterbury Place Bristol, TN 37620

Re: Dynamic Recycling LLC, 220 N Industrial Drive, Bristol, TN 37620 Response to Request for Relief from Low NOx Burner Requirement Construction Permit Application for an Ethanol Production Facility Facility ID 82-1020-01, log 66209

Dear Mr. Evans:

The Division of Air Pollution Control has reviewed your letter dated October 5, 2012, which requests relief from the Division's requirement for low NOx (nitrogen oxides) burner technology for fuel burning equipment. Specifically, you request relief from the low NOx burner requirement for a 400 BHP natural gas and fuel oil fired boiler to be installed at the proposed Dynamic Recycling LLC ethanol production facility to be located at 220 N Industrial Drive in Bristol, Tennessee. Your letter states that the estimated installed cost of the low NOx burner is \$53,612, and NOx emissions would be reduced by approximately 5.82 tons per year assuming predominately natural gas fuel usage. Consequently, the capital cost per ton of NOx emission abatement is \$9,211, which you assert is economically unjustified.

Based upon the review of the information in your letter and supplemental emissions calculations, the Division will not require low NOx burner technology for this project.

Mr. C. Donald Evans, PhD, PE October 11, 2012 Page 2

If you have any questions concerning this letter, please contact either John Trimmer at 615-532-0552 or me at 615-532-0545.

John A. Trimmer

for Assistant Director

Division of Air Pollution Control

LJH/ JAT

cc: Mr. Brian Potter, VP Operations, Dynamic Recycling LLC, 26319 Old Trail Road, Abingdon, VA 24211
File 82-1020-01 S2
Johnson City Environmental Field Office
Green File
JAT
SS