Emissions from the Burning of Vegetative Debris in Air Curtain 1 2 **Destructors** 3 4 5 C. Andrew Miller¹ 6 Paul M. Lemieux² 7 8 U.S. Environmental Protection Agency 9 Office of Research and Development ¹National Risk Management Research Laboratory 10 ²National Homeland Security Research Center 11 12 Research Triangle Park, NC 27711 13 14 15 16 **ABSTRACT** 17 Although air curtain destructors (ACDs) have been used for quite some time to dispose of 18 vegetative debris, relatively little in-depth testing has been conducted to quantify 19 emissions of pollutants other than carbon monoxide and particulate matter. As part of an 20 effort to prepare for possible use of ACDs to dispose of the enormous volumes of debris 21 generated by Hurricanes Katrina and Rita, the literature on ACD emissions was reviewed 22 to identify potential environmental issues associated with ACD disposal of construction 23 and demolition (C&D) debris. Although no data have been published on emissions from 24 C&D debris combustion in an ACD, a few studies provided information on emissions 25 from the combustion of vegetative debris. These studies are reviewed, and the results 26 compared to studies of open burning of biomass. Combustion of vegetative debris in 27 ACD units results in significantly lower emissions of particulate matter and carbon 28 monoxide per unit mass of debris compared to open pile burning. The available data are 29 not sufficient to make general estimates regarding emissions of organic or metal 30 compounds. The highly transient nature of the ACD combustion process, a minimal 31 degree of operational control, and significant variability in debris properties make 32 prediction of ACD emissions impossible in general. Results of scoping tests conducted 33 in preparation for possible in-depth emissions tests demonstrate the challenges associated 34 with sampling ACD emissions, and highlight the transient nature of the process. The 35 environmental impacts of widespread use of ACDs for disposal of vegetative debris and 36 their potential use to reduce the volume of C&D debris in future disaster response

37 scenarios remain a considerable gap in understanding the risks associated with debris 38 disposal options. 39 40 INTRODUCTION AND BACKGROUND 41 On August 29, 2005, Hurricane Katrina came ashore along the Gulf Coast, with the eye initially passing over Plaguemines Parish with 140 mph¹ wind speeds, then continuing 42 43 north and hitting the Louisiana/Mississippi border with wind speeds still over 125 mph. 44 Less than a month later, Hurricane Rita made landfall near the Texas/Louisiana border as 45 a major hurricane with 120 mph wind speeds. Both of these storms produced major 46 storm surges, which combined with the high winds to create enormous amounts of debris 47 from destroyed structures, downed trees, and other vegetative debris. Hurricane Wilma 48 struck the southern Gulf Coast of Florida a month later as a major hurricane, again 49 leaving behind a trail of damage and substantial debris. It is clear that 2005 was a 50 landmark year for hurricanes and tropical storms, but 2004 was also notable for the 51 damage caused by four hurricanes to hit Florida. Although the 2006 hurricane season 52 was relatively quiet for the U.S., it has been predicted that the number of hurricanes and 53 tropical storms will continue to be above the long-term average for at least the next decade, and that the intensity of storms may also be increasing.²⁻⁴ These predictions, in 54 55 addition to the increases in building and population in coastal areas prone to hurricane damage, ⁵ emphasize the need to understand the implications of options for disposal of 56 57 hurricane debris. 58 59 The debris left by each of these storms presented and continues to present tremendous 60 challenges for disaster recovery efforts, first in the efforts to restore transportation, 61 power, and communications, but ultimately in the need to dispose of massive volumes of 62 solid waste material. Hurricanes often create debris measured in millions of cubic yards. and can overwhelm local waste management capabilities.⁶ The volume of debris from 63 64 Hurricane Katrina has been estimated to be on the order of 100 million cubic yards, or 65 approximately 50 million tons, including vegetative and construction and demolition

(C&D) debris, household hazardous wastes, white goods (including large appliances),

and waste containers (including propane and fuel tanks).⁷ This compares to an estimated

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68 245 million tons per year of municipal solid waste generated in the U.S. in 2005, which 69 translates to approximately 3.7 million tons per year in Louisiana, based on per capita waste generation estimates.⁸ Clearly, the debris generated by Hurricanes Katrina and 70 71 Rita represented a major and very sudden increase in the level of solid waste that required 72 disposal. 73 74 One of the methods used to reduce this enormous volume of debris is to burn combustible 75 material, either in large open piles or using air curtain incinerators, also called air curtain 76 destructors (ACDs). More controlled combustion processes, such as found in municipal 77 solid waste combustion systems, may not be suitable due to distance from the disaster site 78 or because of design or regulatory limits on the properties of the waste feed. Even so, 79 any combustion process, and particularly uncontrolled combustion without flue gas 80 cleaning systems, generates potentially significant levels of pollutants that could be 81 emitted into the air. The use of ACDs to reduce the volume of hurricane debris is 82 therefore an approach that carries with it the potential for additional and possibly lasting 83 environmental damage. To develop a comprehensive and protective plan for responding 84 to future disasters, it is important to understand the capabilities and potential risks 85 associated with debris burning and its alternatives, including landfilling, grinding, 86 material reuse, and use as or conversion to alternative fuels. 87 88 The purpose of this paper is to discuss the results of pilot- and full-scale tests that have 89 been previously reported, and to compare those results with results from open pile 90 burning of debris and limited testing of emissions from an ACD conducted during the 91 U.S. Environmental Protection Agency's (EPA) response to Hurricane Katrina. 92 93 AIR CURTAIN DESTRUCTOR 94 Air curtain destructors are generally used to dispose of vegetative debris, such as from 95 large land clearing or forest management operations. These units operate by burning the 96 combustible material in an enclosed space with an open top, over which a high velocity 97 "curtain" of air is directed to reduce the escape of large particles and to improve air 98 circulation into the burning debris. Figure 1 illustrates the general operation of an ACD.

In this schematic diagram, the air flow inside the firebox is depicted as flowing in a generally circular pattern, counterclockwise. The circulation in an actual unit is much more complex (as will be discussed below) but in general provides circulation of air into the combustion zone, and recirculates at least a portion of combustion byproducts back into the high temperature combustion region surrounding the debris. This combination of high air flow into the combustion zone and recirculation of the combustion products is designed to reduce visible particulate matter (PM) emissions and provide increased gasphase residence times compared to open pile burning.

There are several types of ACD designs. The firebox can be a pit dug into the ground with a transportable blower and curtain air plenum positioned to blow the curtain air over and down into the pit. These designs are common in applications such as destruction of forest clearing debris because they are relatively light and can be towed into remote areas with poor roads. A second type of ACD uses a refractory-lined firebox that is entirely above ground. These are approximately the size of a large waste dumpster and incorporate the air curtain fan on the same skid as the firebox. A third design extends the side and back walls of the firebox to minimize the impact of wind and may also incorporate provisions for introducing combustion air (underfire air) into the firebox, underneath the debris to improve the airflow through the combustion zone. This type of unit cannot be transported as an integral unit and can require a week or more to set up and begin operations. In some cases, such as shown in Figure 2, these larger units have a more complex loading arrangement. Other variants on the design include misters or even secondary combustion chambers.

For all these designs, the operation when burning vegetative debris is fundamentally the same. The initial charge of debris is loaded into the unit and ignited, usually with diesel fuel or kerosene. Once the debris has ignited, the blower is started and additional debris is loaded into the unit as needed to maintain combustion. The ignition process can generate a temporary puff of black smoke as the diesel fuel ignites, and smoke typically increases for a brief period as subsequent loads of debris are loaded. Generally, no auxiliary fuel is used to maintain good combustion within the unit.

130 131 PREVIOUS WORK 132 Published data on emissions from ACD units are scarce. There have been a number of 133 studies of open burning over the past decade that provide some basis for comparison. For 134 ACDs, however, the data are less available and tend to be less detailed. A brief description of ACD operation and emissions published by the U.S. Forest Service¹¹ is an 135 136 example of the available documents that describe ACD operations and describe 137 emissions, although only qualitatively. 138 139 CO and PM 140 There are a few studies that have been done over the past 40 years on ACD emissions. 141 Data from three full-scale tests have been found, and two papers that evaluated pilot-scale 142 ACD systems are also in the literature. The earliest of the full-scale studies was 143 published in 1972 by Lambert, who described emissions from a pit-type ACD unit used to burn forest-clearing debris. 12 The pit in which the debris was burned was 41 feet long, 144 145 8 feet wide, and 15 feet deep (12.5 m x 2.4 m x 4.6 m). Lambert reported emissions of 146 carbon monoxide (CO) and carbon dioxide (CO₂), Ringlemann smoke number, and 147 temperatures. CO and CO₂ were measured using a continuous emission monitor (CEMs), 148 PM measurements were taken using a high volume ("hi-vol") ambient sampler, and 149 opacity was measured using the Ringelmann visual method (although no longer in 150 official use in the U.S., the Ringelmann method has been used since the 1880s, as 151 described in Ref. 13; a brief but more technical discussion of the method can be found in 152 Ref. 14). Temperatures were measured with thermocouples in the debris bed and with an 153 optical pyrometer. The average CO measured was 140 ppm, with CO₂ at 0.75%. PM 154 levels were reported as "too low to measure," although opacities were reported to be at ½ 155 Ringlemann smoke number (5%) for 95% of the operating time. During unit startup, the 156 opacity was reported to be 40% (Ringlemann 2), and when diesel fuel was introduced to ignite the bed, Ringlemann numbers as high as 8 were noted. 12 157 158 159 Temperatures were consistently found to be at least 1600 °F (920 °C), and increased with 160 time. Peak temperatures of over 2200 °F (1250 °C) were measured after 11 hours of

161 operation in one test, and as high as 2500 °F (1420 °C) in a separate test. Average steady 162 state temperatures were measured at 1950 °F (1120 °C), dropping to 1450 °F (840 °C) 163 within an hour after the blower was turned off. Lambert reported that overloading of the 164 unit by piling logs 3 feet above the air curtain did not visibly change opacity, and also 165 noted the presence of a blue flame along the length of the air plenum that was visible 166 during night operations. He attributed this flame to the combustion of volatile products 167 that were forced up the air plenum side wall into an area with adequate oxygen to allow 168 combustion to be completed. Lambert also described burning railroad ties in the unit, 169 which produced heavy black smoke below the air curtain, with the pit surface "uniformly 170 covered with a sheet of bright orange flames all along the air curtain." 171 172 A more recent report describing emissions from ACDs was prepared by Fountainhead Engineering in 2000. 15 This study reports emissions from an above-ground ACD unit 173 174 (Air Burners Model S-127), and provides data on CO, CO₂, and PM emissions and 175 opacity sampled at the top of the ACD unit. Over four test runs, the average CO 176 concentration was measured at 54 ppm at CO₂ levels of 0.2%, suggesting a greater level of dilution than in the Lambert study. PM concentrations were measured at 6600 µg/m³, 177 178 and emission rates were reported at 2.14 lb/hr (0.97 kg/hr). At this concentration, opacity levels measured using EPA Method 9¹⁶ were found to range between 4% and 7.5%, with 179 180 an average of 5.4%. 181 182 The final full scale measurements were reported by Trespalacios describing operation of an ACD burning vegetative hurricane debris in Toa Baja, Puerto Rico. ¹⁷ This study 183 184 measured pollutants on the perimeter of the ACD operation site rather than taking 185 samples from the outlet of the unit. The unit used in this operation was similar to that 186 used in the Fountainhead tests. Concentrations of CO and PM were measured at points 50 (15 m) and 100 feet (30 m) upwind and downwind from the ACD. More detailed data 187 188 on organic and metal emissions were also collected. 189 190 Average CO concentrations 50 ft (15 m) downwind from the ACD were 9.3 ppm, and 191 average PM concentrations at the same location were 570 µg/m³. The average values are

192 for three measurements taken over 10 s intervals shortly after loading "dirty debris," a 193 wet mixture of soil and vegetative debris. It is very possible that the steady state 194 averages would be lower than those reported, but additional measurements were not 195 reported. 196 197 Assuming a factor of 10 dilution at 50 ft (93 ppm CO at the ACD face), the corresponding PM concentrations would be 5700 µg/m³, which is consistent with the 198 199 Fountainhead data. It is unclear what the actual dilution factor is, but the relationship 200 between CO and PM in the Trespalacios study appears to be of the same order of 201 magnitude as the Fountainhead data. A factor of 6 dilution would result in CO of 56 ppm (vs. 54 ppm for the Fountainhead measurements) and PM of 3400 µg/m³, yielding a 202 203 PM:CO ratio roughly half that of the Fountainhead unit. 204 205 There are three pilot-scale studies reported in the literature that are also relevant. The 206 first of these was published in 1968, and is very consistent with the later full scale results 207 noted above. Burckle et al. burned cordwood, municipal solid waste (MSW), and tires in a pilot-scale ACD. 18 The unit was 3 ft wide x 3 ft long x 4 ft deep (0.9 m x 0.9 m x 1.2 208 209 m) in size. When burning a 318 lb (144 kg) charge of wood with the air curtain fan operating at 420 scfm (11.9 sm³/min), CO was measured at 100-1000 ppm over the 210 211 course of the test. The tests were conducted for a single fuel charge, and measurements 212 were initiated after combustion had stabilized and continued until the fuel charge burned 213 out. CO₂ concentrations while burning wood at these conditions ranged from 0.1% to 214 1.75%. These values are consistent with the range of concentrations from full scale units. 215 PM was measured at 0.53 grains/dscf (1.2 g/m³), corrected to 12% CO₂, and an emission 216 217 factor of 12.7 lb/ton of fuel was calculated for this test. This concentration value seems 218 quite high, but if the values are corrected to 0.2% CO₂ (the CO₂ concentrations reported 219 in the Fountainhead study), the concentrations are much closer to the results reported for 220 the full scale units. The correction to 12% CO₂ reflects a comparison with enclosed 221 combustion systems such as boilers or incinerators, and may not be as appropriate a 222 comparison as a lower CO₂ concentration likely to be measured in an open burning

situation. At 0.2% CO₂, PM concentrations would be approximately 20,000 µg/m³, 223 224 which is roughly three times the value reported in the Fountainhead report. Although this is considerably higher than the 6600 µg/m³ value from the Fountainhead report, it is 225 reasonably close considering the difference in scale. Differences in fuel and scale make 226 227 it difficult to conclude whether the two results are in fact comparable or if the similarity 228 is simply coincidental. In either case, the Burckle paper provides valuable information 229 on the transient nature of the process. 230 231 An interesting aspect of the Burckle paper is the finding that PM emissions from wood 232 were relatively insensitive to air flow rate. For municipal solid waste (MSW) and tires, 233 the PM emissions increased linearly (as measured by lb/ton of fuel burned) with 234 increasing air flow. Burckle et al. attributed this to the higher ash content of both MSW 235 and tires compared to wood. They do not explain why the PM emissions increase with 236 air flow, but do suggest that other fuels such as sawdust may exhibit higher PM emissions 237 as smaller particles could be entrained in the air/gas flows and carried out of the unit. 238 This may have significant implications for burning of C&D debris, which will have 239 significantly higher levels of incombustibles and will also likely have higher levels of 240 dust and debris fragments that can be stirred up by handling and loading activities and the 241 air curtain and possible underfire air flows. 242 243 The second pilot-scale study is less directly applicable, but does provide some additional 244 insight into the ACD combustion process. Linak et al. burned 1 lb (454 gm) charges of 245 black polyethylene agricultural sheet plastic in a 1 ft x 1 ft x 1 ft (0.3 m x 0.3 m x 0.3 m) 246 pilot-scale unit and made detailed measurements of the organic compounds emitted from the process. 19 They also measured CO and PM and compared the results with and 247 248 without the use of a simulated air curtain. The peak CO dropped slightly from 42 ppm 249 without the air curtain to 37 ppm with the air curtain on when burning new sheet plastic. 250 With the same fuel, average as-measured CO concentrations dropped from 29 ppm with 251 the air curtain off to 23 ppm when the air curtain was on. It is unclear whether this 252 reduction was due to improved performance or to dilution of the CO by the curtain air.

234	interestingly, Fivi concentrations increased when using the simulated all cultain. For the
255	new sheet plastic, PM concentrations were measured at 4730 $\mu\text{g/m}^3$ when the air curtain
256	was on and at 3560 $\mu g/m^3$ when it was off. CO_2 levels during these tests were reported to
257	"vary minimally" in the range of 0.3-0.6%. Although the fuel used in these tests was
258	significantly different, the reported PM concentrations were very similar to those reported
259	in the full scale tests. It is unclear whether this is due to similarities in the combustion
260	process or coincidental.
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262	The third pilot-scale study was reported by Lutes and Kariher, and focused on the open
263	burning of land clearing debris. ²⁰ Samples of woody debris from Tennessee and Florida
264	were burned in a 36 in (91 cm) long x 18 in (46 cm) wide x 16 in (41 cm) deep pilot-scale
265	ACD. The unit was tested with curtain air on and off. Results for CO and $PM_{2.5}$ showed
266	only minor changes in concentration, but significant reductions in mass of emissions per
267	unit mass of fuel burned. Average CO concentrations were reported at 34 ppm without
268	the blower and 37 ppm with the blower (as measured conditions), and average $PM_{2.5}$
269	concentrations were measured at 24,600 $\mu g/m^3$ without the blower and 40,400 $\mu g/m^3$ with
270	the blower. On the basis of emissions per unit mass of fuel, CO fell from 20 g/kg without
271	the blower to 12 g/kg with the blower. Similarly, $PM_{2.5}$ emissions fell from 12 g/kg
272	without the blower to 10 g/kg with the blower. The higher concentrations of CO and PM
273	but lower emissions per unit mass of fuel are a consequence of the more rapid
274	consumption of fuel when the blower was used. For comparable fuel charges, the rate of
275	fuel consumption when the blower was used was as much as two times faster than when
276	the blower was not used. ²⁰ This leads to higher average pollutant concentrations, but
277	over a shorter period of time. For full-scale units, the dilution of the exhaust gases by
278	ambient air entrained into the exhaust plume may also lead to significant differences in
279	reported exhaust concentrations. The dilution will depend upon where the sample is
280	collected – both the location across the opening of the ACD and how high above the
281	ACD exit the sample is collected.
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Organics, Metals, and Other Emissions

The Lambert study did not measure emissions other than CO₂, CO, and PM. ¹² The 284 285 Fountainhead study did take SO₂ and NO₂ measurements, but concentrations were sporadic. SO₂ was found on only one of four runs (at 1 ppm) and NO₂ measured 286 inconsistently at 1-4 ppm. 15 287 288 289 More extensive measurements of trace compounds were taken during the Toa Baja study. 290 Several metals and organics were measured upwind and downwind of the ACD in an 291 effort to quantify emissions from the combustion process. Six metals were detected in 292 the samples: aluminum (Al), cadmium (Cd), chromium (Cr), iron (Fe), lead (Pb), and 293 potassium (K). Al and Fe were detected more consistently, but were also detected at 294 higher levels upwind than downwind, on average. Of the remaining metals, only Pb was detected in more than one of the 8 samples collected, and then in only two. 17 It is 295 296 probable that the higher Al and Fe concentrations are the consequence of the use of "dirty fuel" (wet vegetation combined with soil). The high upwind values further suggest these 297 298 metals are the result of soil-borne elements, and also make it questionable whether the 299 downwind samples were emitted from the ACD as opposed to being from fugitive dust. 300 Because emissions of metals are very strongly dependent upon the composition of the 301 fuel, the applicability of these results to other units is limited to a recognition that ACD 302 combustion conditions appear to be adequate to result in the formation of metal-303 containing particles. 304 305 Of the volatile organic compounds detected, benzene, toluene, chloromethane, and 306 formaldehyde were detected in each downwind sample at concentrations higher than the 307 upwind sample. Besides these compounds, only p-xylene and propionaldehyde were 308 detected in more than two (of eight) samples. The downwind propionaldehyde 309 concentrations were each lower than the upwind concentration, suggesting that the source 310 was not the combustion process. p-xylene was detected at levels above the upwind 311 concentration in at least one sample during each test, indicating that the source was the 312 ACD. 313

314	Concentrations of polychorinated dibenzo-d-dioxins (PCDDs) and polychorinated
315	dibenzofurans (PCDFs) were also measured upwind and downwind of the ACD unit.
316	Toxic equivalent (TEQ) concentrations of PCDDs and PCDFs were not detected in the
317	upwind samples, but were detected in four of six downwind samples, indicating the
318	formation of PCDDs/Fs in the combustion process. No other semivolatile organics were
319	detected in the Toa Baja samples. ¹⁷
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321	The pilot-scale study by Burckle et al. measured total hydrocarbons, carbonyls (reported
322	as formaldehyde), and carboxyls (reported as acetic acid). A continuous hydrocarbon
323	(HC) monitor showed a large initial spike in HC concentrations, which then decreased to
324	a minimum and gradually increased again as the fuel charge burned out. The spike
325	occurred within 10 min of loading, and the second peak was reported at about 60 min
326	after loading. The reported data suggest that increasing curtain air flow can, in at least
327	some cases, result in increased HC concentrations for wood, tires, and MSW (see Figure
328	3). In general, HC emissions (on the basis of mass of emissions per mass of fuel) from
329	wood were lower than HC emissions from tires, which were in turn lower than the HC
330	emissions from MSW. ¹⁸
331	
332	The pilot scale work reported by Linak et al. noted that, "The use of forced air slightly
333	reduced the time necessary to burn each charge, but it did not affect the types or
334	concentrations of PICs [products of incomplete combustion] emitted." ¹⁹ The study
335	identified 37 volatile and semivolatile organic compounds in the collected samples, as
336	well as 18 polycyclic aromatic hydrocarbons (PAHs). Linak et al. noted that emissions of
337	benzene, toluene, ethyl benzene, and 1-hexane increased slightly when the forced air was
338	operating and suggested that this may be due to quenching of the flame by the cooler
339	forced air. With the exception of this difference, there was little reported change in the
340	measured emissions of organic compounds due to changes in fuel type or operating
341	condition.
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Comparison of ACD and Open Burning Emissions

344 For PM, the general range of open biomass burning emissions tends to be on the order of 345 10 g/kg of fuel. Gerstle and Kemnitz reported total PM emissions of 6-12 g/kg for landscape refuse and 7-9 g/kg for municipal refuse.²¹ For different types of biomass, 346 Andreae and Merlet reported PM_{2.5} emissions between 4 and 13 g/kg and total PM 347 emissions up to 18 g/kg, ²² Lemieux et al. reported values for total PM emissions ranging 348 between 10 and 19 g/kg, ²³ and Dennis et al. used emissions of 8-19 g/kg of total PM in 349 their estimates of total emissions from open burning.²⁴ These values are significantly 350 351 higher than the emissions per unit mass of fuel calculated in the Fountainhead test, which 352 were at 0.05 g/kg. It is very likely that even poorly operated systems will exhibit 353 significantly lower PM emission levels when they are able to increase the high-354 temperature residence time of the pyrolyzed organics that form most of the fine PM. For 355 instance, an early dedicated vegetative debris burner was reported to have experienced 356 "excessive smoke" due to overcharging the unit during a test. Even at this overload 357 condition, the reported PM emissions were 1.1 g/kg, roughly an order of magnitude lower than uncontrolled open burning.²⁵ There are likely to be some differences in emissions 358 359 due to the different biomass types and burning conditions, which ranged from prescribed 360 burning of savanna to burning of residential vegetative debris in small piles. Even so, the 361 PM emission factors for open burning are relatively consistent given the wide variety of 362 materials and conditions. 363 364 Interestingly, the pilot-scale results were similar to the reported uncontrolled open 365 burning emission rates. It is unclear why the pilot-scale ACD studies were unable to 366 similarly duplicate the reduced PM concentrations indicated by the full-scale ACD tests, 367 but the complexities involved in achieving simultaneous similarity in combustion, heat 368 transfer, and air flow may be a significant barrier to effective pilot-scale evaluations of 369 ACD emissions, at least without using a computational fluid dynamics (CFD) approach 370 to the design of the experimental apparatus. The hypothesis noted above that a higher 371 residence time may play a significant role in reducing emissions of organics and 372 unburned fuel could well be one of the reasons why pilot-scale units have not been able 373 to effectively simulate the emission rates measured during tests of full-scale units. 374 Scaling an ACD system to simulate physical conditions may well result in combustion

product residence times that are below characteristic reaction times needed to achieve 376 higher burnout levels. 377 378 Reported emissions of CO from open biomass burning varied significantly. Andreae and 379 Merlet reported values of 65-110 g/kg of CO, Lemieux et al. reported a range of 16-110 g/kg, and Gerstle and Kemnitz reported 25-40 g/kg of CO emissions. 21-23 Hays et al. 380 381 reported CO concentrations of 4-2000 ppm for the several types of biomass tested, with similar ranges over 2-3 orders of magnitude noted for each type. ²⁶ These values compare 382 383 to approximately 0.5 g/kg of CO from an ACD burning woody debris as reported in the Fountainhead study.²⁷ (The full report notes a CO emission rate of approximately 20 384 385 lb/hr, compared to a PM emission rate of 2.1 lb/hr for the same runs. The calculated PM 386 mass emission factor of 0.054 g/kg of fuel is provided in a separate letter to the Georgia 387 Department of Natural Resources. The 0.054 g/kg PM emission factor would result in a 388 CO mass emission factor of approximately 0.5 g/kg of fuel, given the same fuel feed rate 389 during the test runs.) The reduction in CO is not as substantial as that shown for PM, but 390 is still significant. It is difficult to directly compare the Lambert and Toa Baja results 391 because of a lack of fuel feed data, but they seem to be of the same order of magnitude as 392 the Fountainhead study (assuming an order of 10 dilution in the Toa Baja results). 393 394 There are a number of studies that report trace organic emissions from different types of 395 open burning. In many of these studies, the lists of organic compounds are quite 396 extensive. Rather than evaluate each compound, we will simply note that: (a) existing 397 data on trace organic emissions from full-scale ACDs are almost nonexistent; (b) studies 398 of open burning have consistently found considerable trace organic compound emissions; 399 and (c) even well-controlled industrial combustion sources exhibit some level of trace 400 organic emissions. Thus, one would expect to measure some trace organics in ACD 401 emissions. 402 403 Similarly, the presence of PCDDs and PCDFs indicated in the Toa Baja study should be 404 expected, as these compounds have also been found in studies of uncontrolled open 405 burning. Gullett et al. showed that PCDDs and PCDFs from the simulated open burning

406 of forest biomass were not solely from the volatilization of condensed material, but were also formed in the combustion process.²⁸ This pilot-scale work verified earlier 407 408 measurements of actual forest and biomass fires that showed these events emit PCDDs and PCDFs. 29, 30 409 410 411 CONTEMPORARY SCOPING MEASUREMENTS OF ACD OPERATION 412 In the aftermath of Hurricanes Katrina and Rita, there was interest in using ACDs to 413 dispose of a portion of the enormous volume of debris left in the storms' wakes. Given 414 the age of many homes in the affected areas, it was expected that a considerable number 415 of homes would likely contain asbestos in one or more products and forms. The majority 416 of asbestos was expected to be in chrysotile form, which can be thermally transformed into a non-hazardous forsterite form at temperatures above 800° C (1470° F). 31, 32 With 417 418 the highly transient nature of ACD operation and the need to maintain temperatures 419 above 800° C, the question was raised regarding the potential for ACDs to be used as a 420 means to achieve the thermal conversion of chrysotile to forsterite under actual operating 421 conditions. In late October 2005, researchers from EPA's Office of Research and 422 Development (ORD) conducted a limited number of simple scoping tests on a full-scale 423 ACD that was being used to demonstrate its ability to burn vegetative debris in the New 424 Orleans area. The purpose of these scoping tests was to provide preliminary information 425 on possible disposal options, evaluate ACD operating characteristics, and determine the 426 most effective approaches to sampling for pollutant emissions during more in-depth 427 testing. 428 429 **Operation and Measurements** 430 The ACD used was an Air Burners, LLC model S327, burning only dry vegetative debris. 431 Loading of the unit occurred from the air plenum side. The unit was situated so that the 432 air curtain was blowing in the same direction as the prevailing wind, which was reported 433 at 10-15 mph with gusts of 25 mph. 434 435 Gas temperature and velocity and concentrations of several gases were measured 436 approximately 6-15 in above the top of the ACD wall. A rough traverse of the area over

437 the top of the ACD was made to identify any variations in gas concentrations. 438 temperatures, or velocities. Portable continuous emission monitors were used to measure 439 concentrations of CO₂, CO, oxygen (O₂), oxides of nitrogen (NO_x), and sulfur dioxide 440 (SO₂). Temperature measurements were taken using thermocouples and with a Series 441 OS523-2 Omegascope infrared thermometer. Five type K thermocouples were installed 442 in the ACD prior to loading with debris to measure wall and combustion bed 443 temperatures at approximately the midpoint of the unit's length, at 7, 32, and 71 in (18, 444 81, and 180 cm, respectively) from the ACD bottom on the blower side and 32 and 61 in 445 (81 and 150 cm, respectively) on the side opposite the blower. A K-type thermocouple 446 was also used at the tip of the sampling probe to measure gas temperatures. 447 Thermocouple signals were recorded using a hand-held thermocouple readout and 448 entered onto manual data sheets. The optical pyrometer was used to take temperatures 449 across the surface of the burning debris bed, and the results were recorded manually. 450 451 **Observations and Results** 452 During "steady state" operation, the opacity of the plume was near zero, and the location 453 of the plume had to be determined using an infrared video detector. When additional 454 debris was loaded into the unit after it had reached steady state operation, the opacity 455 increased to a readily visible level, which lasted for less than a minute following the 456 introduction of the debris charge. The formation of a visible plume did not occur 457 consistently after each charge of debris. Transient plumes were observed in similar 458 operations of an ACD with extended back and side walls operating in a different location, 459 but also burning dry vegetative debris. 460 461 The averages of five gas concentration measurements for CO, CO₂, NO, NO₂, and SO₂ 462 are shown in Table 2. The measurements were taken over the span of 46 minutes in 463 different locations, with each measurement lasting less than a minute. The gas 464 concentrations generally showed relatively high variability, which is not surprising for 465 the low number of measurements taken. Concentrations of CO and CO₂ were higher than 466 those reported previously, but the low number of measurements and possible differences 467 in measurement methods make it difficult to draw meaningful conclusions in comparison

468 to previous work. Concentrations of NO, NO₂, and SO₂ showed similarly high 469 variability, with the low number of measurements again being of concern. Unfortunately, 470 mass feed rates for the fuel were not measured during these scoping tests, so it is not 471 possible to estimate the emission factors for these pollutants. 472 473 There was considerable variation in temperatures across the unit, measured from the 474 blower side to the loading side. The unit is typically loaded from the side opposite the 475 blower. However, for the Phase 1 tests, the unit was loaded from the blower side to allow 476 greater access for gas and temperature measurements. For this discussion, we will refer 477 to the blower side and the loading side (the side opposite the blower) as this terminology 478 more accurately reflects typical operating practice. The higher temperatures were noted 479 along the blower side. Blower side wall temperatures ranged from 670° to 1030° C, with 480 the highest temperatures nearest the combustion bed. Wall temperatures were at a 481 minimum near the midpoint of the 8 ft (2.4 m) wall height, with temperatures increasing 482 again to 930° C approximately 3 ft (0.9 m) from the top. On the blower side, the wall 483 temperatures were 750° C at a point about 3 ft (0.9 m) above the combustion bed and 484 600° C at a point about 4 ft (1.2 m) from the top. Combustion bed temperatures 485 measured with the optical pyrometer ranged from 1020° C near the blower side to 740° C 486 near the loading side. The average temperature (average of all locations and all times) 487 was 920° C. 488 489 Unlike the simple circular pattern suggested in Figure 2, the flow of exhaust gases is 490 quite complex in the unit. Velocity measurements suggest that the vast majority of 491 exhaust flow is occurring in a relatively narrow area along the length of the unit on the 492 side opposite the blower (see Figure 5). Measurements of 15 fps in this narrow area were 493 close to the estimated temperature-adjusted flow velocity based on the ACD fan output. 494 This distribution pattern is not thought to significantly impact the level or composition of 495 emissions from the ACD. However, this finding is important relative to designing 496 approaches to sampling emissions from ACDs. Sampling procedures should take into 497 account the significant variability in gas velocities across the top of the ACD to ensure 498 that the gas sampling locations selected include the area(s) of highest emissions outflow.

499 500 Following the completion of these tests, plans were completed for more detailed testing 501 of emissions from the combustion of C&D and vegetative debris from ACDs. However, 502 as the recovery effort progressed, several factors led to the potential for using ACDs to be 503 significantly reduced. The concerns over emissions raised by previous work (noted above) and by an external review of debris disposal using ACDs;³³ more available 504 505 landfill space than expected in the immediate aftermath of the storm; and a significantly 506 longer lead time for making decisions regarding the demolition of severely damaged 507 buildings all resulted in a decision not to use ACDs as a disposal option at that time. 508 Therefore, there was a reduced need to conduct the more detailed tests during the initial 509 period of storm recovery. However, there is still considerable interest in conducting more detailed studies of air emissions from ACDs³⁴ and it is possible that such tests will 510 511 be conducted in the future. 512 513 DISCUSSION AND CONCLUSIONS 514 When properly operated, both anecdotal evidence and comparison with measurements 515 from simple open burning indicate that ACDs burn vegetative debris in such a way that 516 emissions of PM are reduced, probably significantly, compared to open burning. 517 Concentrations of PM as indicated by opacity measurements are lower for ACDs, which 518 produce plumes with very low opacity for the majority of operating time, and generate 519 visible plumes only during start up and immediately after loading. These transient 520 "puffs" of emissions are likely to be accompanied by increased emissions of organic 521 compounds as well as PM, based on experience with transient events in rotary kiln incinerators and with biomass combustion. 35-37 522 523 524 The lower PM and CO emissions are consistent with the improved combustion conditions 525 that are present with ACDs as compared to open burning – better air flow, containment of 526 heat around the combustion zone, and more controlled introduction of debris. These 527 improved conditions would suggest that emissions of organic compounds are also lower 528 for ACDs than for open burning, but adequate data are not yet available to draw such a

conclusion. The existing data do show a significant potential for emissions of toxic

530	organic compounds. The indications of PCDD/PCDF emissions during the Toa Baja				
531	tests, for instance, suggest that ACD combustion of chlorine-containing material could				
532	lead to the formation and emission of chlorinated organics.				
533					
534	The questions about emissions from C&D debris remain open. Under normal conditions,				
535	C&D debris can be maintained separately from vegetative debris. However, these types				
536	of debris are intermingled during disasters and separating them during recovery would				
537	require time and resources that are more effectively used for other response needs.				
538	Therefore we are left with a need to understand how emissions may differ when burning				
539	C&D as opposed to vegetative debris, or (more likely in a practical situation) a mixture of				
540	the two. Differences in composition and heat content make a direct extrapolation from				
541	existing data from vegetative debris combustion unrealistic. Higher concentrations of				
542	relatively inert inorganic compounds, particularly metals, would be expected in C&D				
543	debris; whether those compounds are emitted into the ambient atmosphere or are retained				
544	in the bottom ash remains unknown. The likely presence of chlorine and other halogens				
545	in C&D debris may also have a significant impact on the types of compounds that are				
546	formed in the combustion process and possibly emitted into the air. Higher				
547	concentrations of sulfur are also likely in C&D debris than in vegetative material, which				
548	can also significantly impact the high-temperature chemistry within the ACD firebox.				
549	Our current understanding of the behavior of these compounds in combustion				
550	environments is largely shaped by studies of either open burning or enclosed and				
551	controlled combustion of municipal solid waste, neither of which can be directly applied				
552	to the current problem. In short, the combustion of C&D debris in ACDs is a new				
553	problem that has not been addressed by previous research.				
554					
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658 FIGURE CAPTIONS 659 Figure 1. Schematic of air curtain destructor operation. Figure 2. Photographs of different air curtain destructor designs. 660 Figure 3. Emission factors vs. curtain air flows for carbonyls (top), carboxyls (center), 661 and total hydrocarbons (bottom) reported by Burckle et al. 18 662 Figure 4. Air curtain bed temperatures as measured by optical pyrometry. 663 Figure 5. Velocity profile across top of air curtain destructor. The velocity peaks near 664 the side wall opposite the air curtain plenum. 665 666 667 668

Tables

671

Table 1. Summary of CO and PM concentrations reported in the literature.

	Full scale			Pilot scale		
Report	Lambert ^{12 (a)}	Fountainhead ¹⁵	Toa Baja ¹⁷	Burckle et al. ¹⁸	Linak et al. ¹⁹	Lutes and Kariher ²⁰
Fuel	Wood	Wood	Wood/Soil (wet)	Cord wood	Polyethylene plastic	Woody Debris
CO (ppm)	140	54 (~ 0.5 g/kg)	9.3	100-1000	23	37
PM opacity and concen- tration	5% opacity	6600 μg/m ³ 5.4% opacity	568 μg/m ³	20000 μg/m ^{3(c)}	4730 μg/m ³	40000 μg/m ³
PM emission factor	NA ^(d)	0.054 g/kg	NA	5.0 g/kg	NA	10 g/kg
CO ₂	0.75%	0.2%	NA	0.1-1.75%	0.3-0.6%	0.05%

- 673 674 675
- a. Pit-type unit
 b. Ambient measurements taken 50 feet downwind of the ACD unit
 c. Corrected to 0.2% CO₂. Reported values were 0.53 grains/dscm (1.2 g/m³) at 12% CO₂.
 d. Not available

Table 2. Concentrations of gases measured at top of air curtain destructor.

top of all dartain destructor.						
Average	Range					
18.0	16.2 – 19.5					
237	319 - 183					
2.5	1.2 – 4.1					
75.0	11 – 100					
4.0	0 – 10					
4.6	2 – 8					
	18.0 237 2.5 75.0 4.0					

681 Figures 682

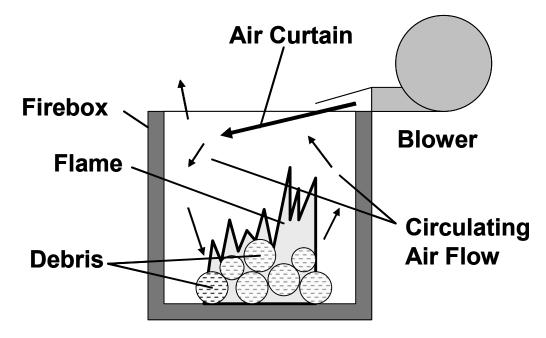


Figure 1. Schematic diagram of air curtain destructor operation.

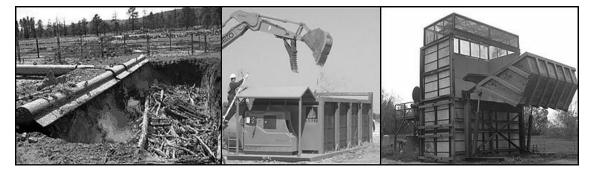


Figure 2. Photographs of different air curtain destructor designs.

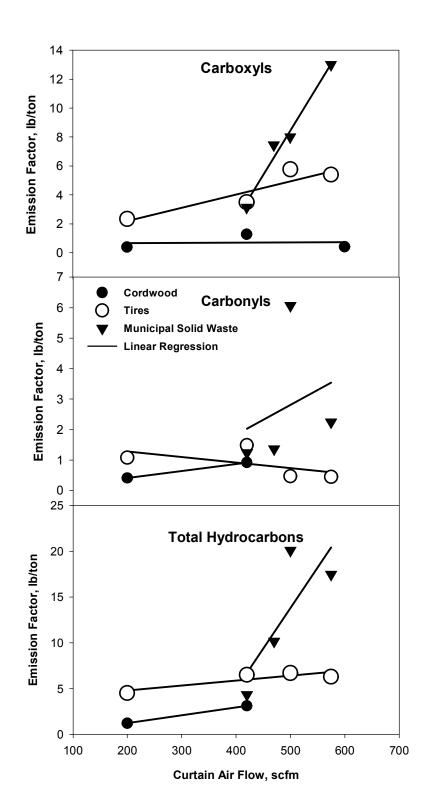


Figure 3. Emission factors vs. curtain air flows for carbonyls (top), carboxyls (center), and total hydrocarbons (bottom) reported by Burckle et al. 18

Average Bed Temperature (as measured by optical pyrometer, deg F)

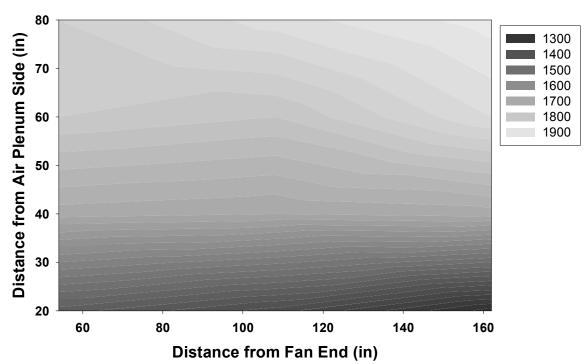
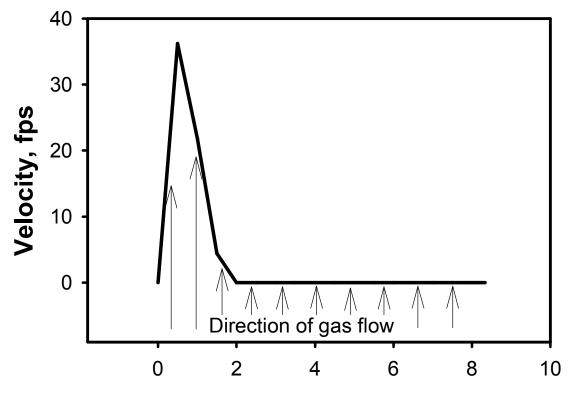


Figure 4. Air curtain bed temperatures as measured by optical pyrometry. Temperatures are lower near the curtain air plenum.

Gas velocity at ACD exit



Distance from side wall, ft (blower at 8.3 ft)

Figure 5. Velocity profile across top of air curtain destructor. The velocity peaks near the side wall opposite the air curtain plenum.