



REGION 7

LENEXA, KS 66219

April 23, 2026

SENT VIA ELECTRONIC MAIL
RECEIPT CONFIRMATION REQUESTED

Brandon Leach
General Manager
Rubble Reprocessing, LLC
10433 Sedgwick Road
Atchison, Kansas 66002
brandon.leach94@outlook.com

RE: Request for Alternative Monitoring Parameters of an Air Pollution Control Device Subject to NSPS Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units

Dear Mr. Leach:

On May 2, 2025, Robynn Andracsek of Providence Engineering and Environmental Group LLC submitted a letter on behalf of Rubble Reprocessing, LLC petitioning the U.S. Environmental Protection Agency to establish operating limits during the initial performance test which will be continuously monitoring thereafter, in accordance with 40 CFR § 60.2115 of the New Source Performance Standards Subpart CCCC—Standards of Performance for Commercial and Industrial Solid Waste Incineration Units (CISWI). The EPA received additional information from Providence and Rubble via email on August 4, 2025, August 20, 2025, December 2, 2025, and January 5, 2026. Rubble plans to operate one incinerator subject to CISWI in or near Atchison, Kansas.

Background

The regulations under 40 CFR § 60.2115 require the owner or operator of a CISWI using an air pollution control device other than a wet scrubber, activated carbon injection, selective noncatalytic reduction, fabric filter, an electrostatic precipitator, or a dry scrubber, or limiting emissions in some other manner, including material balances, to comply with the emission limitations under 40 CFR § 60.2105 to petition the EPA Administrator for specific operating limits that will be established during the initial performance test and continuously monitored thereafter.

Petition

The petition proposes to use direct-fired thermal oxidation to control emissions from the incinerator, which is designed to process non-hazardous liquid waste. Rubble expects emissions of volatile organic compounds from operation of the incinerator. Rubble's petition proposes to continuously monitor liquid flow rate, pressure of injected liquid, and outlet temperature to ensure proper combustion and a 99.9% destruction efficiency of the VOCs. Data from the monitored parameters will be recorded every 15 minutes and have a rolling 24-hour averaging time. Initial stack testing will establish the upper and/or lower values for the monitored parameters, which will in turn establish the operating limits. Rubble proposed to set the minimum temperature using the lowest one-hour average temperature measured during the most recent performance test that demonstrates compliance. The minimum and maximum values for flow and pressure will be set in accordance with the manufacturer's recommended values based on the system design.

Conclusion

Based on information in Rubble's initial request and follow-up emails, the EPA has determined that the Rubble petition meets the requirements of 40 CFR § 60.2115(a) through (e) and approves the use of the proposed operating limits to be established during the initial performance test as described above and continuously monitored thereafter when the unit is in operation. This approval is subject to amendment or revocation based on subsequent information becoming available. Should the expected pollutants, operating conditions, or parameters change, Rubble must submit a revised petition to address any changes. This approval of establishing operating limits when using an alternative air pollution control device does not alter Rubble's obligation to comply with all other applicable requirements associated with 40 CFR Part 60, Subparts A and CCCC.

Please contact Cassie Mance at mance.cassandra@epa.gov if there are any questions regarding this letter.

Sincerely,

VEDA HAKAMI
STOY

Digitally signed by VEDA
HAKAMI STOY
Date: 2026.04.23
16:46:10 -05'00'

Alyse Stoy
Acting Director
Enforcement and Compliance Assurance Division

cc: Robynn Andracsek, Providence Engineering and Environmental Group LLC,
robynnandracsek@providenceeng.com
Gyanendra Prasai, Kansas Department of Health and Environment, Gyanendra.X.Prasai@ks.gov