



June 1, 2011

File Ref: FID 405219980
BROWN
SW / CORR

Mr. Kevin Cornelius
Oneida Seven Generations Corporation
PO Box 257
Oneida, WI 54155

SUBJECT: Acknowledgment of a Proposed Plan of Operation and Notice of Incompleteness for a Waste to Energy Facility

Dear Mr. Kevin Cornelius:

This letter is to acknowledge the receipt of a proposed Plan of Operation dated May 12, 2011 for the Oneida Recycling Solutions located at 1230 Hurlbut Street, Green Bay, WI. The plan was submitted by Bay Environmental for Todd Parczick of Alliance Construction and Design on behalf of Oneida Recycling Solutions, Oneida Seven Generations Corporation. The submittal was received by the Department on May 13, 2011 and is in regards to a proposed facility that would convert solid waste into electricity.

Enclosed is invoice # 6648-9544 for \$3500.00. This invoice is for review fees established in chapter NR 520.04, Wis. Adm. Code. The Department received your payment on May 17, 2011.

This letter is, also, to inform you that the information submitted is incomplete. Due to the intended use of the facility, the Waste Management and Materials Program is reviewing the submittal per NR 502.08 (solid waste processing facility) and NR 502.13 (municipal solid waste combustors). Based on the review of the documentation provided, the following items must be addressed before review of the plan can be completed:

- NR 500.05(6) requires that visuals be legible. The submittal contains 11"x17" plan sheets with details that are not legible. Most of the plan sheets are missing the title blocks. The submittal is missing numerous cross-sections of the interior as well as plan views (including block diagrams, scaled drawings) of the equipment. This information would depict personnel's ability to access necessary sections for repairs. It would also depict facility and equipment design consideration in case large sections or entire processes need to be replaced without causing public or environmental harm.
- NR 502.08(4)(i) requires a complete materials balance for the facility. This should include a break down of materials entering and leaving each station. This is particularly important in the operational parameters of the pyrolytic gasification equipment. It is also important in basic facility operations, third party relationships, and during occurrences of malfunction in storing and moving waste on the property and off site to ensure continued public and environmental protection.
- NR 502.08(4)(j) and 502.13(4)(o) requires wastewater discharge information. The submittal discusses discharge to the sanitary sewer pending Green Bay Metropolitan Sewage District (GBMSD) approval. However, the submittal does not discuss what would happen to the wastewater if GBMSD does not approve of the discharge during any point in the processes' time of operation.

Due to the nature of this operation, and to improve our knowledge, as well as, provide a appropriate evaluation, we have asked for supporting information (i.e. from lab testing and existing operations). The submittal provides information that mixes "waste-to-energy" (WTE) under differing applications. For example, in some literature, there are references to biomass waste burned in boilers to produce energy. There are also references to municipal solid waste (MSW) being incinerated. However, biomass waste differs in energy production than MSW, and boilers differ in operation than incinerators, which also differ in operation than the pyrolysis gasification process. Although there are numerous WTE boilers and MSW incinerators in the US, it appears that current operating pyrolysis applications are at research and testing locations and do not exist on a commercial scale. We are concerned that your proposal is for a large scale facility versus an initially scaled down pilot facility (with the potential for growth pending proven operating success). I cautiously note, in its current form, the information submitted does not provide us with a confidence level that would ensure a reasonable expectation of success.

I am available for further discussion. Once additional information is received to the above items, I will be able to continue with the review process.

I am the lead review staff person assigned to this project. Please feel free to contact me with any questions you have at (920) 622-5493.

Sincerely,



Sally Hronek
Waste Management Engineer
Waste and Materials Management Program

Attachment (invoice # 6648-9544 addressee only)

cc: JaNelle Merry- Project Manager, Bay Environmental Strategies, Inc.