



STATE OF WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN RESOURCES
BUREAU FOR PUBLIC HEALTH
OFFICE OF ENVIRONMENTAL HEALTH SERVICES

Sherri A. Young, DO, MBA, FAAFP
Cabinet Secretary

Matthew Q. Christiansen, MD, MPH
Commissioner & State Health Officer

August 2, 2023

Naren Patel
217 Barefoot Beach Boulevard
Bonita Spring, FL 34134

Dear Mr. Patel:

In examining the West Virginia Draft Permit R13-3563 for Thunder Mountain Environmental Services, LLC, West Virginia Plant, the Department of Air Quality was unable to conclude that the proposed gasifier meets the definition of pyrolysis in Subpart Ec-Standards of Performance for New Stationary Sources: Hospital/Medical/Infectious Waste Incinerators of 40CFR60 (Subpart Ec). This unit will not qualify for exclusion as a pyrolysis unit. The proposed gasifier unit from your company is classified as a large Hospital/Medical/Infectious Waste Incinerator (HMIWI).

Per West Virginia Infectious Medical Waste Rule, 64-56-11. Commercial Medical Waste Management Facilities, "A commercial infectious medical waste management facility may not utilize incineration technology in any form, including the manufacture or burning of refuse-derived fuel in any form." Therefore, our office will be unable to issue Thunder Mountain Environmental Services, LLC an Alternative Treatment Permit or a Commercial Infectious Medical Waste Management Facility Permit for a process determined to be incineration. In this situation, the Alternative Treatment Application and the Commercial Medical Waste Management Facility Permit are considered as the complete alternative treatment process.

Should you have any questions, please feel free to contact me.

Sincerely,

Donna Gorbey-Michael, R.S.
Infectious Medical Waste Program Manager

cc: James Kelsh
Jason Frame
Judy Vallandingham
Stacy King