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DEPARTMENT OF ARMY MUNITION DEACTIVATION POPPING FURNACE

March 25, 1987

Mr. Brent C. Bradford
Executive Secretary
Utah Solid & Hazardous Waste Committee
Utah Department of Health
288 North 1460 West
P.O. Box 16690
Salt Lake City, Utah 84116-0690

Dear Mr. Bradford:

I am responding to your February 25, 1987, letter to me requesting assistance concerning permitting issues associated with Department of Army munition deactivation "popping" furnaces. Sonya Stelmack of the OSW Incineration Permit Assistance Team contacted Connie Nakahara of your staff to provide initial answers to some of your questions. Sonya sent Connie some informational materials and will be keeping her apprised of new developments on these issues. The following is a summary of our response to these issues.

Based on a review of the proposed procedures for using the U.S. Army Environmental Hygiene Agency (USAEHA) sampling train, and from related discussions with the Army, EPA has agreed that the USAEHA train is acceptable for sampling of nitroglycerin and dinitrotoluene as trial burn POHC's, providing that certain requirements are complied with. A memorandum outlining these procedures was included in the information sent to Connie. Rather than specifying QA/QC procedures for measuring stack emissions, we usually ask the applicant to propose a QA/QC plan and then make a determination as to whether the plan is acceptable. Connie was referred to several documents that should be of assistance in reviewing QA/QC plans and was also sent some materials covering this area. I believe the DOA is aware of the documents we referred to but I recommend you verify this with the

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DOA staff you have been working with.

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The issue of whether one waste feed can sufficiently demonstrate the ability of a popping furnace to meet the RCRA requirements, given the variety of munitions to be incinerated, has been brought to our attention by the EPA Regional offices. For any proposed trial burn feeds, the applicant should give a rationale, acceptable to the permitting authority, for why the waste(s) proposed will provide a worst-case test of the unit. k EPA HQ will be discussing this issue further with DOA.

According to your letter, Tooele Army Depot indicated that EPA waived the automatic waste feed cut-off requirement for DOA popping plants. EPA Headquarters has not waived the waste feed cut-off requirement. We recognize that there are safety concerns associated with possible explosion of the munitions close to the furnace due to heat. However, we believe that a system can be devised by DOA to feed only those materials in the hot zone near the furnace when shutdown conditions occur, while cutting off the feed which has not yet approached the high temperature zone. EPA HQ has asked DOA to look into designing such a system.

Enclosed is a copy of our comments on the DOD Draft Instruction on "Hazardous Waste Management Requirements Applicable to the Demilitarization of Conventional Military Munitions and Ordnance," sent to DOA on January 7, 1987. (I believe you have a copy of the instruction.) No further discussions on this document have been held with DOA. In response to your question about Class C explosives, these explosives are not classified as hazardous waste under RCRA.

My office is familiar with the Bureau of Mines' reactivity test procedures which you submitted for review. The methods described have not been adequately validated for RCRA samples. However, we have sent Connie a set of DOA test procedures for reactivity due to explosive properties which is being used by EPA until a validated set of methods is approved.

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The automatic waste feed cut-off requirement and specification of worst-case feeds, as well as other issues you mentioned such as products of incomplete combustion (PIC's), will be discussed at a meeting between EPA and DOA in mid-April. Connie will be kept informed of the progress on these issues and the resulting EPA guidance. As you requested, the Incineration

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Permit Assistance Team will copy you on incineration policy and guidance materials and will provide you with the opportunity to review selected draft documents. If you have further questions, feel free to contact me or have Connie contact Sonya Stelmack directly at (202) 382-4500.

Sincerely,

Marcia Williams
Director, Office of Solid Waste

Enclosure

cc: Susan Bromm
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