

PPC 9488.1991(01)

POHC SELECTION FOR RCRA HAZARDOUS WASTE TRIAL BURN-USE OF  
1,2,3 TRICHLOROBENZENE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 5 1991

Mr. James Buckert, Manager  
Technical Support Unit, Permits Section  
Division of Air Pollution Control  
Illinois Environmental Protection Agency  
P.O. Box 19276  
Springfield, IL 62794-9276

Dear Mr. Buckert:

This is in response to your January 7, 1991 letter on POHC selection for a RCRA hazardous waste incinerator trial burn. You inquired whether 1,2,3-trichlorobenzene would be acceptable to use as a solid POHC, considering that this compound is not listed in 40 CFR Part 261, Appendix VIII.

My understanding from your letter and discussions with you and Mike Davidson is that you believe that, on a technical basis, 1,2,3-trichlorobenzene would be a good choice as a POHC because 1) it is a solid at ambient conditions and thus could be mixed with solid waste feed; 2) with respect to incinerability, 1,2,3-trichlorobenzene is expected to perform similarly to 1,2,4-trichlorobenzene, an Appendix VIII compound which is in Class I of the Thermal Stability at Low Oxygen (TSL<sub>o</sub>O<sub>2</sub>) ranking (This is based on input from Dr. Barry Dellinger, University of Dayton Research Institute, as relayed by Larry Johnson, EPA Office of Research and Development); and 3) the compound is readily available and can be sampled and analyzed by standard EPA methods and procedures.

Thus, your inquiry primarily focused on whether the fact that 1,2,3-trichlorobenzene is not on Appendix VIII would eliminate this compound as a potential POHC. As I mentioned to you in our telephone conversation, this issue was addressed in an April 27, 1990 EPA proposal to amend the hazardous waste incinerator regulations. EPA believes that there are situations

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where compounds not on Appendix VIII may be more suitable as POHC's than Appendix VIII compounds (due to concerns such as availability, toxicity, etc.). For this reason, we proposed to amend §264.342(b)(1) and §270.62(b)(4) to specifically state that POHC's need not be listed in Appendix VIII or be present in the normal waste feed provided the applicant demonstrates that the compound is a suitable indicator of compliance with the DRE standard.

Therefore, your proposal to use a non-Appendix VIII compound as a POHC is considered acceptable in terms of our most up-to-date thinking on POHC selection. Further, since it is planned that the trial burn will include two additional POHC's which are Appendix VIII compounds, the proposed set of POHC's would also be consistent with the current wording of the RCRA incinerator regulations.

If you have any further questions on this issue, feel free to contact me at (202) 382-3132.

Sincerely,

Sonya M. Sasseville, Chief  
Alternative Technology Section

cc: Y.J. Kim, Region V  
Lionel Vega  
Larry Johnson  
Elizabeth Cotsworth