

PPC 9553.1986(04)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 30 1986

MEMORANDUM

SUBJECT: Technical Support Document for BDAT

FROM: Eileen D. Claussen, Director
Characterization and Assessment Division

TO: Regional Waste Management Division Directors

As you know, the treatment standards for land disposal of F001-F005 spent solvents were promulgated on November 7, 1986. The technical support for the development of these standards is contained in the three volume document titled Best Demonstrated Available Technology (BDAT) Background Document for F001-F005 Spent Solvents. Two copies of the three volume set have been attached.

In addition to detailing the development of treatment standards, there is a significant amount of data and information which you may find helpful in implementing the land disposal restrictions program. These data and information include:

- Summary of characterization data on spent solvents affected by this rule.
- Identification of industries which generate these solvents and locations of these industries by region and state.
- Complete data sets used in developing BDAT. These data sets show all constituents contained in the waste as well as various pollutant parameters.
- Discussion of applicable technologies as well as design and operating parameters that need to be taken into account in determining how well these technologies can treat particular wastes.

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With regard to the last item above, we would like to emphasize that the treatment standards promulgated do not require the use of a particular technology; as a consequence, you should be aware that, in certain instances, some of the other technologies discussed may provide less expensive alternatives to comply with the land disposal restrictions. Batch distillation, for example, may be an alternative to incineration for some spent solvents with high solid concentrations, if the temperature and duration of the batch result in a residue that complies with the TCLP leachate concentration for the particular solvent.

You should be aware that the BDAT background document will provide the basis for Agency decisions regarding treatment variances. We are currently developing a guidance document for treatment variances which will more fully discuss this process. Other areas where the BDAT document may be of help is in various permitting activities especially as related to treatment design and operation, corrective action treatment, and helping states determine resources required for implementing the land disposal restriction program.

If you have any questions on how the standards were developed or the application of the technologies, please call Stephen R. Weil at 202-382-4770 or James R. Berlow at 202-382-7917.

cc: Robert Delinger
Stephen Weil
Bruce Weddle
Joseph Carra
David Pepson