

QUESTION: EPA issued enforcement guidance addressing the distinctions between burning hazardous waste for the legitimate recovery of its energy value and burning for disposal (incineration). Given that the unit in which the waste is being burned is appropriate for heat recovery (e.g., a high efficiency industrial boiler) and that the waste and its constituents have a high enough Btu value, is there any limit on the chlorine content of a fuel?

ANSWER: No, the Btu value is the crucial factor in determining if a waste can be legitimately recycled for its heat value. If the chlorine content is high but the heat value (Btu) is over the threshold value, then the chlorine content is ignored.

SOURCE: Steve Silverman

