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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 30, 1995

Mr. John M. Smith, Director
Alabama Department of Environmental Management
P.O. Box 301643
Montgomery, AL 36130-1463

Dear Mr. Smith:

The purpose of this letter is to respond to an inquiry from the Alabama Department of Environmental Management (ADEM) on the U.S. Environmental Protection Agency's (EPA's) position regarding the inclusion of emissions from open burning/open detonation (OB/OD) units at the Anniston Army Depot in the health risk assessment for the Anniston Chemical Agent Disposal Facility.

On May 5, 1994, the Office of Solid Waste transmitted the latest revision to the implementation guidance for conducting risk assessments at RCRA hazardous waste combustion units. In the revised guidance EPA stated that the analysis of risks from combustion units burning hazardous waste should ideally address air emissions from all sources that are an integral part of the combustion operation, including activities such as storage, blending, and handling of wastes fed to the combustion unit itself, as well as storage and handling of combustion residues.

After discussions with ADEM staff, we have reached the conclusion that the OB/OD units at the Anniston Army Depot are not an integral part of the combustion operation associated with the planned chemical agent disposal facility, nor are they the type of activity we would expect the health risk assessment to address. Therefore, in our view, the emissions from these units-do not need to be included in the health risk assessment for the chemical agent disposal facility. Risks associated from the operation of OB/OD units would be addressed during the permitting process for these units.

If you have any questions, please do not hesitate to contact James Michael of my staff at (703) 308-8610.

RO 13726

Sincerely,

Michael H. Shapiro, Director
Office of Solid Waste

cc: Gerald Hardy, State of Alabama
James Michael, PSPD, OSW