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DELISTING PETITION INFORMATION REQUIREMENTS FOR RESIDUES FROM
INCINERATION OF 2,4,5-T AND SILVEX PESTICIDES

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

OCT 28 1987

MEMORANDUM

SUBJECT: Delisting Petition Information Requirements

FROM: Suzanne Rudzinski, Chief
Assistance Branch (WH-563)

TO: Judy Heckman, Chief
Management Support Staff (TS-769C)

The purpose of this memo is to outline the critical elements of a delisting petition for the residues from the incineration of the indemnified 2, 4, 5-t and Silvex pesticides. Other general requirements are presented in the delisting petition guidance document; I believe you already have a copy of this document. The most important data requirements are summarized below.

- A discussion of history behind the petition (i.e., the litigation) for inclusion in the Federal Register.
- Identification of all Appendix VIII constituents present in the waste. This characterization is needed for each different product formulation. We believe you should be able to provide sufficiently detailed information in the format of the confidential product formulations and MSDS. We suggest that you supplement these data with one full Appendix VIII scan of both the major liquid product formulation and the Silvex product.
- A catalog of the pesticides which will be burned, including physical state (aqueous, organic solvent-based liquid, solid, etc.), volume, and origin. If other materials are going to be mixed with the pesticides prior to incineration (e.g., contaminated soils), they must also be fully

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characterized (including contaminant profiles, volumes, origin, etc.).

- A list of any Appendix VIII constituents which may be formed as products of incomplete combustion in the EPA Mobile Incineration Systems (MIS).
- A detailed description of the high resolution GC/high resolution mass spectrometry method which will be used to analyze the incineration residues for PCDDs/PCDFs, including a discussion of the analytical detection limits which you intend to achieve and the appropriateness of such detection limits.
- Process information regarding the carbon filtration unit which will be used to treat the wastewater and the management of the resulting carbon filter cartridges. Also describe any other process changes which will be made so that the MIS can effectively treat the indemnified products.
- Expected waste generation rates for each of the petitioned residues, per batch and over the entire incineration period. Also, provide a definition of 'batch' for each of the petitioned residues (i.e., solids from one day/week's run, one full tank of wastewater, 10 drums of solids). We will use these definitions in the developments for the exclusion.
- Describe the expected residue disposal scenarios if the residues are successfully delisted.

cc: Bob Hall
Dick Valentinetti
Fred Lindsey
Steve Johnson