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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

VIABILITY OF TRIAL BURN RESULTS WITH INCOMPLETE VOST DATA

OCT 15 1987

Charlotte Johnson
Hazardous Waste Division - Permits Section
Louisiana Department of Environmental Quality
P. O. Box 44307
Baton Rouge, LA 70804

Dear Ms. Johnson,

This letter is to confirm my response in our telephone conversation last week regarding the trial burn results from the incinerator at Rollins Environmental Services, LA, Inc. The Rollins facility should be required to redo two DRE runs for the reasons discussed below.

As I understand the situation, incomplete VOST data was received for two of the three trial burn runs. According to the trial burn plan, three sets of tubes were to be used for each run, at 1 liter per minute for 20 minutes. I also understand that the trial burn plan for the facility specifically states that nine VOST samples will be analyzed for the test (consisting of three runs). However, one trap pair was lost in both run one and run three.

Although calculations with the available data yielded DRE values above five nines (or in some cases, above six nines) for carbon tetrachloride and dichlorobenzene, the DRE values for trichloroethylene were 99.995% for run one, 99.997% for run two, and 9.998% for run three. Although run two, for which complete data was available, does meet the four nines DRE, the above values are not high enough to provide a strong indication that the lost samples would likely have resulted in DRE's for TCE four nines for runs one and three.

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According to current policy, minimum stack sampling time for each run should be one hour (two hours is recommended as optimal). A minimum of three VOST trap pairs per run is also standard policy. Because the Rollins trial burn plan clearly requires analysis of nine samples in keeping with the above policy, and the results available for TCE are not significantly above four nines, the Rollins facility should be required to retest for DRE. This will provide data which can stand up to public scrutiny and better assure that the facility can test the DRE standard over a period of time.

Since the data for one run was good, it is only necessary that two runs be redone. These runs should, to the extent possible considering availability of waste feeds, duplicate the successful run from the first trial burn. In planning the retest, it should be kept in mind that taking the minimum number of samples would again leave open the possibility for a need to retest if any samples are lost. Therefore, it may be desirable to take extra samples. Although all samples that are analyzed must be reported, it is only necessary to analyze the minimum number of samples per run. Feel free to give me a call at (202) 382-4500 if you have any questions.

Sincerely,

Sonya M. Stelmack
Incinerator Permit Assistance Team

cc: Henry Onsgard, Region VI
Larry Johnson, ORD-EMSL
Alex Wolfe, OSW

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