

9488.1985(04)

MAY 30 1985

MODIFICATION OF INCINERATOR PERMITS TO BURN DIOXIN WASTES

SUBJECT: Modification of ORD Incinerator Permit for
Denny Farm Site

FROM: John H. Skinner
Director
Office of Solid Waste (WH-562)

TO: David A. Wagoner
Director
Waste Management Division, Region VII

In your memo of April 16, 1985, your interpretation, that a permitted incinerator does not need certification to handle dioxin wastes, is correct. As you also indicated a permitted incineration facility must notify the Regional Administrator in accordance with 40 CFR §264.343(a)(2) of their intent to burn dioxin wastes and the Region must determine whether the facility's permit needs modification before the operator may burn the wastes. If the existing permit states the incinerator may burn specific dioxin wastes and the permit requires the incinerator to achieve a 99.9999% DRE on these wastes then the permit would not need to be modified to incorporate the revised Part 264 regulations.

Based on telephone discussions with Joe Galbraith of your staff, it appears that the permit Region VII issued for the operation of the EPA mobile incinerator at the Denny Farm Site does meet the criteria described above and would not need to be modified. It is our understanding that the Region is considering incorporating the waste codes for those wastes into the permit. We do not believe this is necessary because the permit is specific in describing the dioxin waste which can be incinerated. However, if the Region does want to incorporate the waste codes, we agree with the Region that this type of modification would be minor and fits into the general category of 40 CFR §270.42(a) (correcting typographical errors).

If you have any questions regarding any other modifications of the Denny Farm permit, please contact Arthur Glazer at FTS 382-4692.

RO 12410

cc: Barry Korb
Matt Strauss
Conrad Kleveno
Peter Guerrero