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DETERMINATION ON THE LEGALITY AND APPROPRIATENESS OF USING
INCINERATION FOR P078

United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

July 26, 1994

Mr. Michael G. Fusco
Environmental Affairs Specialist
Rollins Environmental Services
One Rollins Plaza, P.O. Box 2349
Wilmington, Delaware 19899

Dear Mr. Fusco:

Thank you for your letter dated May 31, 1994, requesting an EPA determination on the legality and appropriateness of using incineration for two P078 waste streams. In your letter, you propose to incinerate two waste streams: P078-contaminated debris and P078 rinsate contaminated with CFC-113. These waste streams are generated by NASA Kennedy Space Center. NASA was granted a determination of equivalent treatment on the CFC contaminated waste stream in November of 1992 to treat that waste stream by the method that they proposed (neutralization).

The original treatment standard of ADGAS is defined as "Venting of compressed gases into an absorbing or reacting media (i.e., solid or liquid) - venting can be accomplished through physical release utilizing valves/piping; physical penetration of the container; and/or penetration through detonation". Because the NASA's P078 is not a gas but rather a liquid dimer, and the P078 has already been absorbed onto the debris or into the rinsate liquid, the actual standard of ADGAS has been achieved. When NASA requested a Determination of Equivalent Treatment for this waste, we expressed to them that they actually comply with the treatment standard "ADGAS." NASA, however, still wanted the Determination of Equivalent Treatment, which they thought would make it easier for them to treat their waste by neutralization and landfill any residuals, without any question about them being in compliance with the land disposal restriction regulations. The Agency, then,

granted a determination of equivalence.

With regard to your request, the debris and P078 waste have met the "ADGAS" standard, and a determination of equivalent treatment is unnecessary. If these wastes are incinerated, the Agency recommends that the residuals meet the numerical treatment standards for Chromium, Nickel and 1,1,2-Trichloro-1,2,2-trifluoroethane specified to NASA.

If you have any further questions on this issue, please call Mary Cunningham of my staff at (703) 308-8453.

Sincerely,

Matthew Straus, Director
Waste Management Division

cc: Richard Kinch, HQ
Mary Cunningham, HQ
Steve Silverman, HQ
Jim Thompson, HQ
Judy Sophianopoulos, Region IV
Gary Miller, Region VI
James Wright, NASA