

4WD-RPB

MEMORANDUM

SUBJECT: U.S. Army - Picatinny Arsenal Request for Waiver from 40 CFR. Part 64,  
Subpart CC Standards for Tanks at a Proposed Hazardous Waste  
Incinerator

FROM: Denise Housley, National Expert  
RCRA Organic Air Emission Regulations

TO: Raymond Basso, Chief  
RCRA Programs Branch  
US Environmental Protection Agency Region 2

This letter is in response to your memorandum of August 9, 1999, to Sonya Sasseville regarding the merit of Picatinny's above referenced request. Region 4 has recently been delegated the responsibility as national contact for the RCRA Organic Air Emission Standards and was forwarded your memorandum for response.

Region 4 has reviewed Picatinny's Wavier Request and has determined that there is no current provision for wavier from compliance with the RCRA Organic Air Emission Standards for Tanks, Surface Impoundments and Containers, otherwise known as Subpart CC. On review of the information submitted by Picatinny, Region 4 cannot identify any exemption applicable to Picatinny's Slurry Feed System Tanks TK-2A and TK-2B as currently constructed.

Region 4 does recommend that Picatinny consider the installation of an enclosure with closed vent system to an enclosed combustion control device if the facility prefers to have the tanks remain open-topped. The facility could also consider fixed-roof tanks with additional safety controls such as rupture seals, nitrogen blanketing, fire suppression systems, temperature monitoring, oxygen monitoring, pressure monitoring and detonation arresters.

As Region 4 considered the information submitted, the Region noted that a grinder unit was immediately prior to the slurry tanks in the incinerator feed preparation process. This grinder unit is a miscellaneous unit (Subpart X unit) and as such, is also subject to the RCRA Organic Air Emission Standards. In most instances, grinders can meet the definition of a tank and can meet either the Subpart CC Tank

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Level 1 or Level 2 standards.

Region 4 noticed that the facility intended to use 1A2 55-gallon drums for waste stored in Building 1094. Region 4 recommends that the facility verify that for each waste type expected to be stored in the Building that the 1A2 drum complies with that waste's required packaging standards under 49 CFR Part 173. The facility can determine this by cross-referencing 49 CFR §172.101 Hazardous Material Table column (8), "Packaging", with the specified section of 49 Part 173.

Region 4 offers one last comment regarding Tank TK-7. This Tank, according to the information submitted, may contain waste with less than 500 ppmw of volatile organics. To maintain this exemption under 40 CFR §265.1083 (c)(1) and the 40 CFR §264.1082 (c)(1), a waste determination must be made before hazardous waste is placed in the tank, and thereafter, a waste determination must be made each time averaging period that hazardous waste is managed in the unit per 40 CFR §265.1084 and 40 CFR §264.1083. (January 21, 1999 Clarification)

If Region 4 can be of any greater assistance in this matter, please contact me at 404/562-8495.

cc: Sonya Sasseville, HQ PSPD  
David Eberly, HQ PSPD

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