APPENDIX A

DATA ON AVAILABLE COMBUSTION CAPACITY

APPENDIX A

MEMORANDUM

TO: The RCRA Docket

SUBJECT: Meeting Notes with Rollins and Rollins' Highway 36
re: Rollins Incineration Capacity and Treatment of Selenium Wastes

DATE: May 7, 1996

Participants:
Mike Fusco, Rollins Environmental
Richard Grondin, Rollins' Highway 36
Mike Petruska, OSW/HWMMD/WTB
Mary Cunningham, OSW/HWMMD/WTB
Elaine Eby, OSW/HWMMD/WTB
Anita Cummings, OSW/HWMMD/WTB
C. Pan Lee, OSW/HWMMD/AIB
Suzanne Wade, Versar

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This meeting note mainly summarized the part discussing incineration capacity and treatment problems. Rollins expressed repeatedly that there is much incineration capacity available in Rollins facilities and they can handle both process wastes and contaminated media. The second issue brought up by Rollins was the concern of not being able to meet UTS for selenium.

Rollins submitted CBI for their incineration capacity (EPA has retained two copies and the rest gave back to Rollins). Both copies had been handed to CBI Document Control Officer of OSW. Rollins stresses that they have not been utilizing the maximum available operating capacity for handling both liquids and solids wastes for recent years. They are not seeing much wastes come to incinerators, especially from Phase II wastes -- they do not dispute over our capacity analysis methodology, but express that generators may redirect materials handling in the processes and do not generate as much wastes as LDR estimated.

Rollins states that adding more binders to achieve selenium UTS is just dilution and does not incur a treatment if other metals (e.g., lead, cadmium, nickel) are also present in the wastes. They are not able to find proper agents to treat selenium down to UTS level for the wastes they received. Also, they have been seeing more concentrated wastes come to incinerators for the past 7 to 8 years because some generators may use dryer instead of filter press to reduce the waste volume and actually the wastes become more toxic due to waste minimization and present treatment problems for treaters.

Attached please see the notes prepared by WTB's contractor (Versar) for the overall discussion in the meeting.

DRAFT SUMMARY OF MEETING WITH REPRESENTATIVES OF ROLLINS ENVIRONMENTAL SERVICES (RES) TO DISCUSS COMMENTS ON PHASE IV

May 7, 1996, 10:00 - 11:30 a.m.
2800 Crystal Station
Arlington, VA
2nd Floor, Conference Room B

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ATTENDEES

Elaine Eby, EPA/OSW/WTB
Mary Cunningham, EPA/OSW/WTB
Michael Petruska, EPA/OSW/HWMMD
C. Pan Lee, EPA/OSW/HWMMD
Anita Cummings, EPA/OSW/WTB
Suzanne Wade, Versar
Mike Fusco, RES
Richard Grondin, RES

The purpose of this meeting was for EPA and RES representatives to discuss RES comments on the Proposed Phase IV rule (proposed treatment standards for characteristic metal wastes). The primary concerns were that there currently is sufficient thermal treatment capacity for wood preserving wastes and contaminated media (in contrast to generator's claims that there is insufficient capacity), and that they cannot consistently meet the UTS for selenium and arsenic for certain wastes.

First RES stated that they currently have excess capacity that would be suitable for thermal treatment of wood preserving wastes and contaminated media. A recent (1995) EI Digest survey also shows excess capacity industry-wide. This should allow the treatment standard to be issued without a capacity variance, according to Mike Fusco of RES.

RES has a major difficulties with stabilization of selenium to UTS levels, especially when other constituents are present. The solubility of selenium is lowest at a pH of 6.5 to 7.5, but other metals such as cadmium, nickel, and lead, are highly soluble at this pH. Currently, they treat 2000 - 3000 T per yr. of all selenium-containing wastes (listed and characteristic), including K061, and with the current treatment levels must turn away some of the waste because the waste cannot be treated to the UTS concentration. RES believes 1.0 mg/L is a reasonable number for Se instead of 0.16 mg/L. This issue is bigger than TC; it is a problem for all selenium wastes (except shampoo which contains percent levels of Se but few other constituents). Other representatives from the major companies in the waste treatment industry were informally surveyed by RES. They all said Se was a problem but the volume was not high enough for them to comment.

RES also has a problem with treatment of mercury wastes that is not related to Phase IV. When the untreated concentration is greater than 260 mg/kg, the regulations require treatment by

retort; however RES would prefer to treat it using stabilization. The residue from retorting is high in chloride content, so it cannot be stabilized because of current EPA regulations; RES must send it to Canada for stabilization. They are in the process of submitting a treatability variance for this waste.

Organometallics (such as organoarsenates) can also be difficult to treat because of restrictions on combustion of metals and stabilization of organics. RES feels that arsenic is difficult but possible to stabilize. They have rejected some creosote type waste because of high organics.

RES does not have major concerns with meeting metal treatment standards for UHCs for nonwastewaters. In general, they feel that UTS for characteristic wastes are technically feasible but will cost more because of associated development and optimization costs. They also believe there will be a volume increase in treatment residuals. RES is seeing more concentrated wastes in their feed streams because of waste minimization, which can be difficult to treat. Sand (as in foundry wastes) might actually help the stabilization, like slag.

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