

*This applies to all soil clean units*



ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30385

RECEIVED

OCT 23 1989

DER-BAQM

Mr. C.H. Fancy, P.E., Chief  
Bureau of Air Quality Management  
Twin Towers Office Building  
2600 Blairstone Road  
Tallahassee Florida 32399-2400

Dear Mr. Fancy:

Pursuant to your request for comments on the proposed Environmental Technology Southeast construction permit (file No: AC 160167033) for a portable soil remediation unit dated October 4, 1989, we have the following comments:

1. Specific conditions. Item 7. You provide that the concentration of total Halogens in the contaminated soil shall not exceed 4000 parts per million (ppm). In a November 29, 1985, Federal Register notice (50FR 49175), it is stated that used oil containing more than 1000 ppm of total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in Subpart D of 40 CFR Part 261. The notice goes on to say that persons may rebut this presumption by demonstrating that the used oil does not contain hazardous waste (for example, by showing that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in Appendix VIII of Part 261). Since your permit condition allows the source to automatically burn soil up to the 4000 ppm level without any hazardous waste presumption, we recommend that additional restrictions regarding halogen levels in the soil be added to the permit which triggers the hazardous waste presumption for soils at or above 1000 ppm total Halogens.

*Rec'd 11/29/89 FR*

2. Specific Conditions: Item 9, 15, and 16 - We recommend that you prescribe in the permit, with regards to the required test methods, the number of test runs and the test run durations. For Method 5 tests, we recommend that you specify the minimum sample volumes.

*See 11/22 reference*

3. Specific Conditions: Item 9 - You provide that Benzene emissions shall not exceed .48 lbs/hr and that total VOC emissions shall not exceed 37.5 lbs/hr., and prescribe Method 25 as the required test method. We recommend the use of Method 18 instead of Method 25 for determining the amounts of Benzene being emitted. The Method 25 test results for VOC's will be reported as total C (carbon) not as VOC, and as a result you can't specifically

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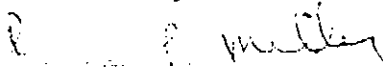
-2-

identify the amount of Benzene being emitted. However, the Method 18 test will provide you with information on the specific compounds being emitted (e.g., Benzene).

4. Specific Conditions: Item 19 - You provide that a differential pressure gauge to measure the pressure drop in the scrubber and a thermocouple to measure temperature in the afterburner shall be installed, and that the readings for both shall be recorded during a compliance test. ~~We recommend~~ that you stipulate in the permit that the scrubber water flowrate also be monitored, and that ~~all parameters (temperature, pressure drop, flowrate) be~~ continuously recorded (not just during compliance test). We also recommend that you stipulate in the permit that ~~all equipment shall be properly maintained and calibrated, and that the monitoring equipment is in operation at all times during operation of the kiln.~~

Thank you for an opportunity to comment on the above package. If you have any questions regarding these comments please contact Stuart Perry of my staff at (404) 347-2864.

Sincerely,



Bruce P. Miller, Chief  
Air Programs Branch  
Air, Pesticides and Toxics  
Management Division

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

*Claire Fancy*

Initial

Date

2. *Miller*

**RECEIVED**

Initial

Date

3. **OCT 23 1989**

Initial

Date

4. **DER - BAQM**

Initial

Date

REMARKS:

*Called 10/20/89*

*Since this one is on "hold" I didn't make copies of this FAX. It's a little hard to read. It should be sitting the original my desk now. B. Miller has already signed it.*

*Fancy*

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

*Diane Kraft*

DATE

PHONE