



**DIRECTIVE NUMBER:** 9527.02(82)

**TITLE:** EPA's Mobile Incinerator

**APPROVAL DATE:** 11-2-82

**EFFECTIVE DATE:** 11-2-82

**ORIGINATING OFFICE:**

☒ **FINAL**

☐ **DRAFT**

**STATUS:**

**REFERENCE (other documents):**

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Key Words: Incineration

Regulation: 40 CFR 270.62

Subject: EPA's Mobile Incinerator

Addressee: Regional Administrator and Regional Waste Management Directors,  
Regions I-X

Originator: Rita M. Lavelle, Assistant Administrator, Office of Solid Waste  
and Emergency Response

Source Doc: #9527.02(82)

Date: 11-2-82

Summary:

EPA has developed policy to expedite the issuance of RCRA permits to mobile treatment units. (See recent memo titled "RCRA Permits for Mobile Treatment Units and Multiple Sites Using the Same Type of Equipment"). The first application of this policy is likely to be in relation to EPA's mobile incinerator. A model RCRA application and model permit for the mobile incinerator has been prepared. These models address the non site-specific permit conditions, these will not change from site to site.

The criteria to be used for selecting future operating sites for the mobile incinerator include: 1. incinerability of the material; 2. degree of hazard based on nearness to population, toxicity, amount, etc.; 3. cost; 4. time; 5. policy. EPA's mobile incinerator must obtain all permits required by Federal, State and local governments at each site.

MEMORANDUM

SUBJECT: EPA's Mobile Incinerator

FROM: Rita M. Lavelle, Assistant Administrator  
Office of Solid Waste and Emergency Response

TO: Regional Administrator and Regional Waste  
Management Directors, Regions I-X

This memo is to inform you of our plans for the use of EPA's mobile incinerator.

We have developed a policy that will expedite the issuance of RCRA permits to mobile treatment units. This policy is discussed in a recent memo from my office entitled, "RCRA Permits for Mobile Treatment Units and Multiple Sites Using the Same Type of Equipment."

The first application of this policy is likely to be in relation to EPA's mobile incinerator. The unit has recently begun a TSCA PCD test burn. The data collected during the TSCA test burn will be used for the incinerator's first RCRA permit at the Kin-Buc Superfund site.

John Skinner, Acting Director, Office of Solid Waste, is preparing a model RCRA application and model permit for the mobile incinerator for use at additional sites. The model will specifically address the non site-specific permit conditions that will not change from site to site.

In addition to the model RCRA permit, Kenneth Biglane, Director, Hazardous Response Support Division, is developing a protocol to select future operating sites for the mobile incinerator. The criteria to be used for selecting subsequent sites are as follows: 1. incinerability of the material; 2. degree of hazard based on nearness to population, toxicity, amount, etc.; 3. cost; 4. time; 5. policy. No single factor except the first would, of itself, preclude the use of the mobile incinerator at a particular site. The purpose of the protocol is to identify those sites having wastes amenable

to incineration where the degree of hazard is significant, incineration is cost effective, and time and policy constraints argue against waiting for the implementation of other technologies.

Finally, keep in mind that EPA's mobile incinerator must be in possession of all permits required by the Federal, State, and local governments at each site. Each region must be careful to coordinate these permits so that all the many details are worked out in advance of the mobile incinerator's arrival. You must also coordinate the unit's use to ensure that operations are conducted in a safe and legal manner.

I have discussed this approach with Dr. John A. Todhunter, Assistant Administrator for Pesticides and Toxic Substances, since the model permit and selection protocol are also applicable to the use of the mobile incinerator for PCE's.

If you have any questions about the RCRA permit for the mobile incinerator call Randy Chrismon at FTS 382-4535. Questions about the site selection protocol should be directed to Steve Droller at FTS 340-6740.

cc: John A. Todhunter