United States Environmental Protection Agency Office of Solid Waste and Emergency Response



DIRECTIVE NUMBER: 9488.07(85)

TITLE: Effect of Water-Stripped POHCs on Incinerator DRE

APPROVAL DATE: 6-26-85

EFFECTIVE DATE: 6-26-85

ORIGINATING OFFICE: Office of Solid Waste

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DRAFT

STATUS:

[] A- Pending OMB approval
[] C- For review &/or comment
[] D- In development or circulating

REFERENCE (other documents):

CHARLES AND THE SHEET SHEET

Key Words: Incineration, POHCs, DRE

Regulations:

Subject: Effect of Water-Stripped POHCs on Incinerator DRE

Addressee: Roland W. Schrecongost, Acting Director, Hazardous Waste

DOC: 9488.07(85)

Management Divison, Region III

Originator: John H. Skinner, Director, Office of Solid Waste

Source Doc: #9488.07(85)

Date: 6-26-85

Summary:

The memo provides Headquarters' guidance regarding the calculation of DRE for a RCRA incinerator using plant process water in its scrubbers.

26 JUN 1985

MEMORANDUM

SUBJECT: Effect of Water-Stripped POHCs on

Incinerator DRE

FROM: John H. Skinner

Director

Office of Solid Waste (WH-562)

TO: Roland W. Schrecongost

Acting Director

Hazardous Waste Management Division, Region III

(3HW00)

In your memorandum of June 11 (attached). you requested Headquarters' guidance regarding the calculation of Destruction and Removal Efficiency (DRE) for a RCRA incinerator using plant process water in its scrubbers. As was discussed in the Incinerator Workgroup conference call held on June 18, we agree with your opinion that: (1) toluene and acrylonitrile, found in the process water, are suitable POHCs for Union Carbide's unit; and (2) all POHCs in the exhaust gases, including any POHCs stripped from the scrubber, should be included in the DRE calculation. Please contact Pablo Vaquer of my staff on PTS-382-4535 if you have further questions regarding this issue.

Attachment

cc: Permit Branch

Incinerator Permit Writers' Workgroup

WH-563: PVaquer: pv: S243: 24535: 6/25/85: Disk Pablo II Control No. OSW-107