Rec'd 8/9/83

RCRA RECORDS CENTER
FACILITY Pratt & Whitney - Main St
I.D. NO. CTD990672081
FILE LOC. R-1B
OTHER RDMS #2704

Hazardous Waste Incinerator Trial Burn Plan Evaluation (DRAFT)

Applicant Pratt + Whitney Aircraft Location E. Hartford, CT

POHC(s)			Comment Number
1. Has selection of POHC(s) been approved by WMD?	Yes ____	No X	____
2. Has (have) POHC(s) been adequately identified?			
a) chemical composition description adequate.	Yes ____	No X	____
b) heating value.	Yes ____	No X	____
c) viscosity.	Yes ____	No X	____
d) concentration.	Yes ____	No X	____

Incinerator Description			
1. Manufacturer's name and model number.	Yes X	No ____	____
2. Type of incinerator, ~~and description of operation, including~~;	Yes X	No ____	____
3. Description of operation	Yes X	No ____	____
4. Procedures for; a) start-up,	Yes ____	No X	1
b) shut-down,	Yes ____	No X	1
c) emergency shut-down.	Yes ____	No X	1
5. ~~3~~. Linear dimensions including cross sectional area of combustion chamber.	Yes X	No ____	____
6. ~~4~~. Description of auxiliary fuel system (type/feed).	Yes X	No ____	____
7. ~~5~~. Description and capacity of prime mover.	Yes X	No ____	____
8. ~~6~~. Description of automatic waste feed cut-off system(s).	Yes X	No ____	____
9. ~~7~~. Nozzle and burner design.	Yes X	No ____	____
10. ~~8~~. Material(s) of construction.	Yes X	No ____	____

			Comment Number
11. 2. Location and description of devices for measuring;			
a) temperature,	Yes X	No ___	___
b) pressure,	Yes X	No ___	___
c) feed rate(s),	Yes X	No ___	___
d) combustion gas velocity,	Yes ___	No X	___
e) carbon monoxide,	Yes X	No ___	2
f) diagram indication location of above.	Yes ___	No X	___

Pollution Control Equipment

1. Manufacturer's name(s) and model number(s).	Yes ___	No X	3
2. Type of control device(s) and description of operation.	Yes X	No ___	___
3. Linear dimensions including cross section of stack.	Yes X	No ___	___
4. Material(s) of construction.	Yes X	No ___	___
5. Location and description of devices for measuring;			
a) temperature,	Yes X	No ___	___
b) pressure differential,	Yes ___	No X	4
c) scrubbing medium injection rate,	Yes ___	No X	___
d) scrubbing medium injection pressure,	Yes ___	No X	___
e) scrubbing medium pH,	Yes ___	No X	5
f) diagram indicating location of above.	Yes ___	No X	___

Sampling Procedures

1. Particulate			
a) Detailed sampling procedures.	Adequate ___	Inadequate X	6
b) Detailed QA procedures.	Adequate ___	Inadequate X	6
2. HCL			
a) Detailed sampling procedures.	Adequate ___	Inadequate X	6
b) Detailed QA procedures.	Adequate ___	Inadequate X	6

			Comment Number
3. POHC DRE			
a) Detailed sampling procedures.	Adequate ____	Inadequate X	7
b) Detailed QA procedures.	Adequate ____	Inadequate X	7
4. Scrubbing medium			
a) Detailed sampling procedures.	Adequate ____	Inadequate X	8
b) Detailed QA procedures.	Adequate ____	Inadequate X	8
5. Ash residues			
a) Detailed sampling procedures.	Adequate ____	Inadequate X	8
b) Detailed QA procedures.	Adequate ____	Inadequate X	8
6. ~~Other~~ Waste Feed			
a) Detailed sampling procedures.	Adequate X	Inadequate ____	____
b) Detailed QA procedures.	Adequate ____	Inadequate X	9

Analysis Procedures

1. Particulate ~~and HCL~~			
a) Detailed analytical procedures.	Adequate ____	Inadequate X	6
b) Detailed QA procedures.	Adequate ____	Inadequate X	6
2. HCL			
a) Detailed analytical procedures.	Adequate ____	Inadequate X	6
b) Detailed QA procedures.	Adequate ____	Inadequate X	6
3. POHC DRE			
a) Detailed analytical procedures.	Adequate ____	Inadequate X	7
b) Detailed QA procedures.	Adequate ____	Inadequate X	7
4. Scrubbing medium			
a) Detailed analytical procedures.	Adequate ____	Inadequate X	8
b) Detailed QA procedures	Adequate ____	Inadequate X	8

5. Ash residues

			Comment Number
a) Detailed analytical procedures.	Adequate ____	Inadequate X	8
b) Detailed QA procedures.	Adequate ____	Inadequate X	8

6. ~~Other~~ Waste Feed

a) Detailed analytical procedures.	Adequate ____	Inadequate X	10
b) Detailed QA procedures.	Adequate ____	Inadequate X	10

Anticipated Incinerator and Control Equipment Operation Conditions (for each POHC)

			Comment Number
1. Feed description.	Yes ____	No X	
2. Feed rate.	Yes X	No ____	
3. Auxiliary fuel feed rate.	Yes ____	No X	
4. Incineration temperature range.	Yes X	No ____	
5. Scrubber parameters.	Yes ____	No X	12
6. Carbon monoxide emissions.	Yes X	No ____	
7. Combustion gas velocity.	Yes X	No ____	

Hazardous Waste Incinerator Trial Burn Plan Evaluation ~~[illegible]~~ — Comments

Comment Number

1 Some of this information is contained in the submittal, although not specifically required by the regulation. I feel it would be beneficial to have P&W submit an incinerator/emissions-control system operations and maintenance manual which would contain a detailed description of procedures (including operational parameter ranges) the operator must follow for;

a start-up (cold),
b shut-down,
c. emergency shut-down,
d. automatic shut-down,
e. re-starting (warm).
f. normal operations

The manual should also include a plan for conducting "normal" maintenance procedures and periodic maintenance inspections of both systems (including monitoring devices). Changes to the manual should be reported to EPA/CT DEP. Operating records, maintenance records and inspection records should be retained by P+W for a minimum of two years and should be made available at the request of EPA/CT DEP.

Hazardous Waste Incinerator Trial Burn
Plan Evaluation — Comments

Comment Number	
2.	P+W has provided very little information concerning their CO EEM system. This system must successfully complete a performance specification test (PST) prior to the conduct of the Trial Burn. P+W should contact ESD for details of pretest report, pretest conference and PST procedural requirements. A separate O&M manual for this system is desireable.
3. ✓	Model numbers not mentioned
4. DMP	Pressure differential is measured accross the venturi but apparently not accross the packed tower/demister. All require continuous measurement.
5. DMP	A more detailed explanation of the Serfilco pH controller/monitor is desireable.
6. Save for later	P+W has indicated that the proper procedures will be used, however a detailed testing protocol (pretest report) must be submitted for review

Hazardous Waste Incinerator Trial Burn
Plan Evaluation — Comments

Comment Number	
6 cont.	P+W should contact ESD for details concerning pretest report requirements. Also, a pretest conference will be required at least 10 days in advance of the test date. The conference should be held at P+W and should be attended by appropriate personnel from P+W, P+W's testing contractor, EPA and CT DEP.
7. later	P+W has made no mention of POHC testing. A detailed sampling and analysis plan must be submitted for review. (ESD can supply information concerning POHC sampling and analysis using the VOST method.) However, the POHC(s) should be chosen prior to submittal of this plan.
8. later	A detailed sampling and analysis plan must be submitted
9.	P+W has made no mention of ~~sample~~ sample handling/chain-of-custody procedures to be used.

Hazardous Waste Incinerator Trial Burn Plan Evaluation — Comments

Comment Number	
10 later	A detailed analysis plan must be submitted
11 later	POHC(s) not yet chosen
12.	See Pollution Control Equipment items 5.a) – 5.e) and comments 4 and 5.

ROUTING AND TRANSMITTAL SLIP

Date 8/4/83

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Bill Torrey		
2. Waste Mgt. Div.		
3. CTD... 081		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate	X	For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

A neater copy will follow shortly. Let me (or Don) know if this is adequate.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
John Carlson	ESD
	Phone No. XT 254

041-102

U.S. G.P.O. 1982-361-529/156

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206