Message

From: Galbraith, Michael [Galbraith.Michael@epa.gov]
Sent: 7/17/2018 12:21:31 PM
To: Valdez, Heather [Valdez.Heather@epa.gov]; Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]; Tidmore, Guy [tidmore.guy@epa.gov]
CC: Kohler, Amanda [Kohler.Amanda@epa.gov]; Young, Jessica [Young.Jessica@epa.gov]
Subject: Re: Hazardous Waste Thermal Desorption

[redacted]

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

From: Valdez, Heather
Sent: Monday, July 16, 2018 6:32 PM
To: Galbraith, Michael; Fruitwala, Kishor; Tidmore, Guy
Subject: Fw: Hazardous Waste Thermal Desorption

[redacted]

Thanks!

Heather Valdez
RCRA Corrective Action and Permitting Project Manager
1200 6th Ave, AWT-150
Seattle WA, 98101

206-553-6220
valdez.heather@epa.gov

From: Castrilli, Laura
Sent: Monday, July 16, 2018 10:07 AM
To: Valdez, Heather
Cc: Knittel, Janette; McArthur, Lisa
Subject: FW: Hazardous Waste Thermal Desorption

[redacted]

Laura Castrilli
(206) 553-4323; castrilli.laura@epa.gov
Office of Air and Waste
EPA Region 10; 1200 Sixth Ave., Suite 155 MS AWT-150; Seattle, WA 98101

From: Hamlin, Tim
Sent: Monday, July 16, 2018 9:35 AM
To: McArthur, Lisa <McArthur.Lisa@epa.gov>; Castrilli, Laura <Castrilli.Laura@epa.gov>
Subject: FW: Hazardous Waste Thermal Desorption

[redacted]

From: Andrew Marshall [mailto:andrew.marshall@usecology.com]
Sent: Saturday, July 14, 2018 9:46 AM
To: Hamlin, Tim <Hamlin.Tim@epa.gov>
Subject: Hazardous Waste Thermal Desorption

Tim,

I hope all is going well in Seattle. I want to express my appreciation of your teams efforts on getting our TSCA permit renewed. It sounds like our Grand View, Idaho facility and your team are working well together to get this renewal knocked out. Thank you.

When we were together a few months ago, I raised an issue that US Ecology has been deeply involved in trying to ensure there is national consistency on the regulatory requirements for thermal desorption technology used for the treatment of hazardous waste. There is a thermal desorption unit owned and operated by Waste Management in Oregon that we recently discovered is expanding its operation and submitted a RCRA permit modification with the State of Oregon. US Ecology in conjunction with our partner TDX Associates will be submitting comments to Oregon DEQ by the close of the comment period next week. We will cc you on our email submission of comments to ODEQ.

It appears that there has been no consideration for the EPA's extensive review of this technology and resulting interpretation of the regulations which is necessary in establishing necessary operating parameters and emission requirements for this operation. This has us concerned with the direction of the project and the

establishment of consistent regulatory interpretations. EPA's position originated in Region 6 as a result of an enforcement action brought against our company. We agree with EPA's interpretation and have been working closely with EPA Region 6 and EPA headquarters staff to ensure EPA's position is consistently applied.

I have included two background documents. One is a May 2, 2016 letter from EPA that discusses the how the vent gasses from a thermal desorption unit operating under the same regulatory provision that Waste Management is proposing to operate under should be regulated under RCRA. The second attachment is a letter dated June 24, 2016 from EPA to the State of Louisiana addressing the same requirements for an identical unit that is being constructed at Waste Management's facility in Carlyss, Louisiana. Waste Management agreed to comply with these requirements in the permit that was issued for their Louisiana facility.

We have found that the many State agencies processing these permits may not be fully aware of EPA's regulatory position and generally have limited experience in permitting hazardous waste operations that include thermal destruction. We would appreciate Region 10's support in working with Oregon DEQ to ensure these regulations are consistently applied. We understand that Richard Duval in ODEQ's Eastern Oregon office is taking the lead on Waste Management's permit modification request.

This treatment technology is very complex and we would appreciate the opportunity to meet with your technical staff in Seattle to discuss the details of how the thermal desorption process works and the conclusions of how EPA interpreted the regulatory requirements. We are also willing to connect your staff with the Region 6 staff that has been involved in these previous projects.

Thanks for your support.

Andrew Marshall
Executive Vice President
Regulatory Compliance and Safety

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