Message

From: Johnson, Barnes [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C39E9338CBF04DC3B4B29F78E5213303-JOHNSON, BARNES]
Sent: 9/12/2018 12:23:46 PM
To: Stenger, Wren [stenger.wren@epa.gov]
Subject: FW: Hazardous Waste Regulatory Standards for Thermal Desorption Units
Attachments: DSW_variance_for_TDUs_EPA-HQ_2018Sept.pdf

Wren,

[redacted]

Take care,

Barnes Johnson
USEPA | Resource Conservation and Recovery | Tel 703-308-8895 | johnson.barnes@epa.gov | @EPAland

-----Original Message-----
From: Carl Palmer [mailto:cpalmer@tdxassociates.com]
Sent: Monday, September 10, 2018 6:24 PM
To: Johnson, Barnes <Johnson.Barnes@epa.gov>
Cc: Devlin, Betsy <Devlin.Betsy@epa.gov>; Elliott, Ross <Elliott.Ross@epa.gov>; Young, Jessica <Young.Jessica@epa.gov>; Atagi, Tracy <Atagi.Tracy@epa.gov>; Harrison, Ben <Harrison.Ben@epa.gov>; Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>
Subject: Hazardous Waste Regulatory Standards for Thermal Desorption Units

Barnes,

Attached is the letter that we discussed at our meeting last Thursday.

Thank you for offering to review this matter. EPA staff have significant expertise that can be added to this important national discussion.
Without your direction, it is clear to me that the States are prepared to issue variances and "permits" that are not protective. Not because they mean to do harm. But simply because they do not have the expertise to evaluate a complex application of a TDU being used to "recycle" listed and characteristic hazardous waste. It is not as simple as just "reclaiming oil."

We have found that Region 6 got it right with Rineco and USE/TD*X. The technical standards of MACT EEE when applied to a TDU constrain the unit to an operating mode that is naturally protective. Straying outside of that window is prohibited by the layers of OPLs and emission limits. Without those constraints, the recycling facility has the potential to accept many undisclosed or even unlooked for pollutants like mercury, arsenic, chromium, lead and organic chlorine that can generate hydrochloric acid. Then, because those pollutants were not designed for, or demonstrated, their potential (and real) emissions can be hundreds to thousands of times greater that if appropriately constrained by MACT EEE technical standards.

We look forward to your response.

Carl

--

Carl R. Palmer, P.E.
TD*X Associates LP
(919) 349-1583 mobile