

8/1/89

to: Bob Kirkpartick
Bill Blankenship
NM EID Air Quality Bureau

C. Kelly Crossman
NM EID Hazardous Waste Bureau

from: Michael Horan
Taos tel: 758-3522

Gentlemen:

Enclosed, please find complete copies of the new U.S. EPA Guidances on Emissions for Heavy Metals, Hydrogen Chloride and for PIC (Products of Incomplete Combustion).

My comment is that I think the Heavy Metals and HCl guidance is bewildering in its complexity and will never be put into practical application anywhere. Also, it provides too many loopholes by allowing calculation of emissions from the feed material.

and LAER

I much prefer a technology based BACT derived stack gas volume concentration emissions limit such as Shiva Garg has done with the PIC emissions limit.

Surprisingly, there have been -0- BACT determinations by U.S. EPA for hazardous waste incinerators. I also understand that EPA Region 6 has never ordered a stack gas sample for heavy metals on any incinerator in their region.



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HC and PIC

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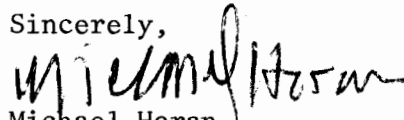
My argument is to go with a straight LAER & BACT technology based stack gas emissions limit and let the vendor companies fight it out in the marketplace as to who has the cleanest equipment.

I mean NO_x automobile emissions are limited at the exhaust pipe, right? So why can't you limit heavy metals and radionuclides at the stack on the TA-50 TRU waste incinerator.?

I sincerely can't imagine the EPA Heavy Metals and HC guidance feed material calculations ever being done anywhere except perhaps in an EPA workshop.

The EPA sampling protocols are child's play by comparison, so why not assign the stack gas limit and the corresponding sampling protocol and be done with it?

Sincerely,



Michael Horan
tel: 758-3522
Taos

Encls: complete copies
U.S. EPA Guidances on Heavy Metals,
HC and PIC

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Hazardous Waste Incineration



Guidance on Metals and Hydrogen Chloride Controls for Hazardous Waste Incinerators

Volume IV of the Hazardous Waste
Incineration Guidance Series

DRAFT

D-1 D-3

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