

AP42 Section: 6.3

Title: Correspondence 1990 and 1991

Note: This material is related to a section in *AP42, Compilation of Air Pollutant Emission Factors, Volume I Stationary Point and Area Sources*. AP42 is located on the EPA web site at www.epa.gov/ttn/chief/ap42/

The file name refers to the file number, the AP42 chapter and then the section. The file name "rel01_c01s02.pdf" would mean the file relates to AP42 chapter 1 section 2. The document may be out of date and related to a previous version of the section. The document has been saved for archival and historical purposes. The primary source should always be checked. If current related information is available, it will be posted on the AP42 webpage with the current version of the section.

The safety association of the commercial explosives industry • Founded 1913

February 28, 1991

Emission Factor and Methodologies Section (MD-14)
U.S. Environmental Protection Agency
Research Triangle Park, North Carolina 27711

Re: AP-42

Dear Sir/Madam:

The purpose of this letter is to respond to the Notice received from the U.S. Environmental Protection Agency (EPA) pertaining to the Agency's proposed revision of the publication entitled Compilation of Air Pollution Emission Factors, AP-42, and to advise the Agency that the Institute of Makers of Explosives (IME) intends to submit, in the near future, comments concerning the document.

IME is the safety association of the commercial explosives industry in North America. IME is a nonprofit association which was founded in 1913 to provide technically accurate information and recommendations concerning explosive materials and to serve as a source of reliable data about their use.

The primary concern of IME is the safety and protection of employees, users, the public and the environment in the manufacture, transportation, storage, handling, use and disposal of commercial explosive materials used in mining, quarrying, construction, demolition, oil and gas exploration and other essential operations.

On February 12, 1991, IME received an EPA notice indicating a review and revision of AP-42 is being undertaken by EPA and that only information available to the Agency by March 1, 1991 would be considered during the initial review and revision. While IME is aware of technical inaccuracies in the sections of the current version of AP-42 which pertain to or impact upon the commercial explosives industry, and while IME desires to furnish comments to EPA detailing and correcting these inaccuracies, it is not possible to provide this information by the March 1 deadline. It simply is not possible for the commercial explosives industry to disseminate, review and report on an issue of this importance within sixteen (16) days.

Emission Factor and Methodologies Section
February 28, 1991
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We are completing the review of AP-42 as quickly as possible on a realistic timetable.

We recommend that public participation in the revision process be via the federal rulemaking process.

Sincerely,



Frederick P. Smith, Jr.
President

J. McSorley



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR AND ENERGY ENGINEERING RESEARCH LABORATORY
RESEARCH TRIANGLE PARK
NORTH CAROLINA 27711

OCT 23 1990

SUBJECT: Technical Assistance in Support of RCRA Subpart X: Open Burning/Open Detonation (OB/OD)

FROM: Frank T. Princiotta, Director (MD-60)

A handwritten signature in black ink that reads "Frank T. Princiotta". The signature is written in a cursive style and is positioned to the right of the typed name.

TO: David A. Wagoner, Director
Waste Management Division
Region VII

I have received your request for providing you with technical assistance on open burning of propellant, explosive and pyrotechnic (PEP) materials which are subject to future RCRA regulations under Subpart X. I have forwarded your request to Bob Hall who is Chief of our Combustion Research Branch for his immediate review and comments. He has informed me that his Branch will need about two weeks to review the PEP materials and other background information that you submitted with your request for technical assistance. Bob will have his combustion research staff contact Joe Galbraith of your staff as soon as they have reviewed your OB/OD background information package.

The Hazardous and Solid Waste Amendments (HSWA) of 1984 to the Resource Conservation and Recovery Act (RCRA) require the issuance of these permits by November of 1992. Region VII intends to meet that schedule; therefore, it is important that we have the data by the end of FY-91.

Thank you for your consideration. Please let us know where we can help in getting this program underway. If you have any questions, please contact ~~Joe Galbraith~~ of my staff at FTS 276-7634.

Attachment

cc: Bill Rice, DRA Region VII



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

OCT 05 1990

MEMORANDUM

SUBJECT: Request for ORD Technical Assistance in Support of Subpart X

FROM: David A. Wagoner
Director, Waste Management Division

TO: Frank T. Princiotta, Director
Air and Energy Engineering Research Laboratory
Research Triangle Park, N. C. 27711

Region VII of the Environmental Protection Agency (EPA) needs detailed combustion data on open burning operations in order to evaluate applications and issue permits that will be protective of human health and the environment. We request your assistance in the development of that data.

Preliminary discussions regarding this project have been held with Joe McSorley of your staff at recent meetings of the Hazardous Waste Incineration Workgroup. Joe has apprised us of your willingness to assist Region VII with this type of technical support.

Some research and modeling data have been provided by applicants. Excerpts of this data are included as an attachment to this memo to assist your staff in determining the most appropriate research and development program. We will provide more specific information on materials that are burned at specific sites. We may even be able to obtain small amounts of these materials for test burns; however, we have not explored the Department of Defense (DOD) policy regarding the shipment of potentially explosive wastes.

Although not discussed with Joe McSorley, we also have need for data on open detonation operations. We recognize that open burning and open detonation are very different and that the emission products are not the same. However, we request that you also consider open detonation as a research project.

Region VII has very limited funds for supporting any research in these areas and therefore request your ORD management to help us in these most important projects.

October 17, 1990

Note to Bill Plyler:

Please note this request from Region 7 to assist them in evaluating information relating to the open burning of DOD wastes. They are also interested in information regarding open detonation. Please review the attached package with the aim of finding a way we can help the Region within our resource constraints. Please prepare an appropriate response by cob Oct. 23 for my signature.

for Pat Sharpe
Frank Princiotta

Attachment

cc:
Blair Martin



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR AND ENERGY ENGINEERING RESEARCH LABORATORY
RESEARCH TRIANGLE PARK
NORTH CAROLINA 27711

~~W/it~~
FYI en
Amno burn
VAB

DATE: November 5, 1990
SUBJECT: OB/OD Support for Region VII
FROM: Paul Lemieux
Combustion Research Branch (MD-65)
TO: Chuck Darvin, CTC Co-Chair
MD-61

*2 fax Paul the names
of our sources - Bill Mitchell &
Paul Clements - He had not been
convinced of their work. (Bill in the sp. C. Paul
side of the EPC from Region VII) (In the Feb. C. Paul
meeting, I was credited
with convincing Paul)*

In a memo to Frank Princiotta dated October 5, 1990, Region VII expressed a need for support to determine potential emissions from the open burning/open detonation (OB/OD) of ammunition and munitions waste from DOD sites. They have a considerable amount of OB/OD occurring in their Region, and it is very likely a widespread problem all across the country. Permits allowing facilities to perform further OB/OD must be issued by the end of 1992. The level of currently available emissions information is limited to an equilibrium-based mathematical model that is so inadequate as to not even predict the formation of oxides of nitrogen from burning highly nitrogenated compounds.

We are in the process of preparing a reply to Region VII which will suggest that, if funding were available, AEERL could perform a series of limited open burning tests on a few select classes of materials. Any open detonation work would probably not fall under the scope of this limited project because it would be necessary to do any open detonation testing at the actual DOD sites due to safety considerations. If the CTC were to provide funding in the \$25K - \$30K range, we believe that a short study could be performed that would enable AEERL to gather enough information to provide guidance to the Region and improve the Region's existing model. It may be possible to get some funding from the Region to support this project as well, but how much money the Region has available at this time is not known.

Enclosed is the packet of information from the Region. If you have any questions or comments, call me at x-0962.

cc: R.E. Hall
J.A. McSorley