DRAFT SUMMARY OF MEETING WITH REPRESENTATIVES OF ROLLINS ENVIRONMENTAL SERVICES (RES) TO DISCUSS COMMENTS ON PHASE IV

May 7, 1996, 10:00 - 11:30 a.m.
2800 Crystal Station
Arlington, VA
2nd Floor, Conference Room B

ATTENDEES

Elaine Eby, EPA/OSW/WTB
Mary Cunningham, EPA/OSW/WTB
Michael Petruska, EPA/OSW/HWMMD
C. Pan Lee, EPA/OSW/HWMMD
Anita Cummings, EPA/OSW/WTB
Suzanne Wade, Versar
Mike Fusco, RES
Richard Grondin, RES

The purpose of this meeting was for EPA and RES representatives to discuss RES comments on the Proposed Phase IV rule (proposed treatment standards for characteristic metal wastes). The primary concerns were that there currently is sufficient thermal treatment capacity for wood preserving wastes and contaminated media (in contrast to generator's claims that there is insufficient capacity), and that they cannot consistently meet the UTS for selenium and arsenic for certain wastes.

First RES stated that they currently have excess capacity that would be suitable for thermal treatment of wood preserving wastes and contaminated media. A recent (1995) EI Digest survey also shows excess capacity industry-wide. This should allow the treatment standard to be issued without a capacity variance, according to Mike Fusco of RES.

RES has a major difficulties with stabilization of selenium to UTS levels, especially when other constituents are present. The solubility of selenium is lowest at a pH of 6.5 to 7.5, but other metals such as cadmium, nickel, and lead, are highly soluble at this pH. Currently, they treat 2000 - 3000 T per yr. of all selenium-containing wastes (listed and characteristic), including K061, and with the current treatment levels must turn away some of the waste because the waste cannot be treated to the UTS concentration. RES believes 1.0 mg/L is a reasonable number for Se instead of 0.16 mg/L. This issue is bigger than TC; it is a problem for all selenium wastes (except shampoo which contains percent levels of Se but few other constituents). Other representatives from the major companies in the waste treatment industry were informally surveyed by RES. They all said Se was a problem but the volume was not high enough for them to comment.

RES also has a problem with treatment of mercury wastes that is not related to Phase IV. When the untreated concentration is greater than 260 mg/kg, the regulations require treatment by

retort; however RES would prefer to treat it using stabilization. The residue from retorting is high in chloride content, so it cannot be stabilized because of current EPA regulations; RES must send it to Canada for stabilization. They are in the process of submitting a treatability variance for this waste.

Organometallics (such as organoarsenates) can also be difficult to treat because of restrictions on combustion of metals and stabilization of organics. RES feels that arsenic is difficult but possible to stabilize. They have rejected some creosote type waste because of high organics.

RES does not have major concerns with meeting metal treatment standards for UHCs for nonwastewaters. In general, they feel that UTS for characteristic wastes are technically feasible but will cost more because of associated development and optimization costs. They also believe there will be a volume increase in treatment residuals. RES is seeing more concentrated wastes in their feed streams because of waste minimization, which can be difficult to treat. Sand (as in foundry wastes) might actually help the stabilization, like slag.