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Environmental Technology Verification Report

Evaluation of the MART Corporation's EQ-1 Wastewater Processing System

Prepared by



Under a Cooperative Agreement with



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Environmental Technology Verification Report

Evaluation of the MART Corporation's EQ-1 Wastewater Processing System

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FOREWORD

The Environmental Technology Verification (ETV) Program has been established by the U.S. Environmental Protection Agency (EPA) to evaluate the performance characteristics of innovative environmental technologies for any media and to report this objective information to the states, local governments, buyers, and users of environmental technology. EPA's Office of Research and Development (ORD) has established a five-year pilot program to evaluate alternative operating parameters and to determine the overall feasibility of a technology verification program. ETV began in October 1995 and will be evaluated through September 2000. EPA is preparing a report to Congress containing results of the pilot program and recommendations for its future operation.

EPA's ETV Program, through the National Risk Management Research Laboratory (NRMRL), has partnered with *CTC* under the Environmental Technology Verification Program P2 Metal Finishing Technologies (ETV-MF) Center. The ETV-MF Center, in association with EPA's Metal Finishing Strategic Goals Program, was initiated to identify promising and innovative metal finishing pollution prevention technologies through EPA-supported performance verifications. The following report describes the verification of the performance of the MART Corporation's EQ-1 Wastewater Processing System.

ACRONYM and ABBREVIATION LIST

AF	Air Force
AGE	Aircraft Ground Equipment
amps	Amperage
ANG	Air National Guard
AVG.	Average
AW	Airlift Wing
Ba	Barium
Cd	Cadmium
COC	Chain of Custody
Cr	Chromium
CTC	Concurrent Technologies Corporation
Cu	Copper
DCN	Daraclean®
DOD	Department of Defense
EPA	U.S. Environmental Protection Agency
ETV	Environmental Technology Verification
ETV-MF	Environmental Technology Verification Program P2 Metal Finishing Technologies
FID	Flame Ionization Detector
FPS	Final Polishing System
ft ³	Cubic Feet
g	Gram
gal	Gallon
GC	Gas Chromatography
gph	Gallon per Hour
gpm	Gallon per Minute
g/L	Gram per Liter
HCL	Hydrochloric Acid
HDPE	High Density Polyethylene
HP	Horsepower
HQ	Headquarters
hr	Hour
Hz	Hertz
ICP-AES	Inductively Coupled Plasma – Atomic Emission Spectrometry
ID	Identification
IDL	Instrument Detection Limit
kWh	Kilowatt-hour
lb	Pound
L	Liter
m ³	Cubic Meters
MART	The MART Corporation
MDL	Method Detection Limit
mg	Milligram
mg/L	Milligram per Liter
mL	Milliliter

NA	Not Applicable
ND	Not Detected
Ni	Nickel
NIOSH	National Institute of Occupational Safety and Health
No	Number
NRMRL	National Risk Management Research Laboratory
O&G	Oil and Grease
O&M	Operating and Maintenance
OANG	Ohio Air National Guard
ORD	Office of Research and Development
P	Percent Recovery
Pb	Lead
PEL	Permissible Exposure Limit
POTW	Publicly Owned Treatment Works
ppm	Part per Million
PVC	Polyvinyl Chloride
QA	Quality Assurance
QC	Quality Control
QMP	Quality Management Plan
Ref.	Reference
RI	Refractive Index
RPD	Relative Percent Difference
rpm	Revolutions per Minute
S	Siemens
SM	Standard Methods for Examination of Water and Wastewater, 20 th ed. (1998)
SR	Spiked Result
SSR	Spiked Sample Result
STE	Short Term Exposure
TCLP	Toxicity Characteristic Leaching Procedure
TS	Total Solids
TSA	Technical Systems Audit
TSS	Total Suspended Solids
TWA	Time Weighted Average
U.S.	United States of America
VAC	Voltage (AC)
vs	Versus
wk	Week
μ	Micro
°F	Degrees Fahrenheit

ACKNOWLEDGEMENTS

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THE ENVIRONMENTAL TECHNOLOGY VERIFICATION PROGRAM



U.S. Environmental Protection Agency



Concurrent Technologies Corporation

ETV VERIFICATION STATEMENT

TECHNOLOGY TYPE:	ENCAPSULATION	
APPLICATION:	AQUEOUS CLEANING APPLICATIONS	
TECHNOLOGY NAME:	The MART EQ-1 Wastewater Processing System	
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The United States Environmental Protection Agency (EPA) has created the Environmental Technology Verification (ETV) Program to facilitate the deployment of innovative or improved environmental technologies through performance verification and dissemination of information. The goal of the ETV Program is to further environmental protection by substantially accelerating the acceptance and use of improved, cost-effective technologies. ETV seeks to achieve this goal by providing high-quality, peer-reviewed data on technology performance to those involved in the design, distribution, financing, permitting, purchase, and use of environmental technologies.

ETV works in partnership with recognized standards and testing organizations, and stakeholder groups consisting of buyers, vendor organizations, states, and others, with the full participation of individual technology developers. The program evaluates the performance of innovative technologies by developing test plans that are responsive to the needs of stakeholders, conducting field or laboratory tests (as appropriate), collecting and analyzing data, and preparing peer-reviewed reports. All evaluations are conducted in accordance with rigorous quality assurance protocols to ensure that data of known and adequate quality are generated and that the results are credible.

The ETV P2 Metal Finishing Technologies (ETV-MF) Program, one of 12 technology focus areas under the ETV Program, is operated by Concurrent Technologies Corporation, in cooperation with EPA's National Risk Management Research Laboratory. The ETV-MF Program has evaluated the performance of a wastewater recycling technology for recycling aqueous alkaline cleaners and/or treating spent cleaning solutions. This verification statement provides a summary of the test results for the MART EQ-1 Wastewater Processing System.

VERIFICATION TEST DESCRIPTION

The MART EQ-1 System was tested, under actual production conditions, using spent alkaline cleaner solutions, at the 179th Airlift Wing (AW) in Mansfield, Ohio. Alkaline cleaning is performed on their C-130H aircraft engine compressors and various parts on the aircraft (engine panels, tire rims, bolts, heaters, aircraft ground equipment, etc.). The verification test evaluated the ability of the MART EQ-1 System to sufficiently remove oils, suspended solids, and heavy metals, to recover the alkaline cleaning chemistry, or to treat the alkaline cleaner for discharge to the Publicly Owned Treatment Works (POTW).

Testing was designed to treat cleaners from four distinct processes:

- During the first test, the MART EQ-1 System was evaluated on its ability to remove contaminants (primarily oil and cadmium) from spent alkaline cleaner and rinse water used to clean C-130H engine compressors. The alkaline cleaner and water were treated through the EQ-1 and the optional Final Polishing System (FPS).
- During the second test, the MART EQ-1 System was evaluated on its ability to recover the contaminated alkaline cleaning chemistry used in the R&R parts washer. The alkaline cleaner was treated through the EQ-1 only.
- During the third test, the MART EQ-1 System was evaluated on its ability to recover the contaminated alkaline cleaning chemistry used in the Aircraft Ground Equipment (AGE) parts washer.
- During the fourth test, the MART EQ-1 System was evaluated on its ability to recover the contaminated alkaline cleaning chemistry used in the Engine Shop parts washer. Again, the alkaline cleaner was treated through the EQ-1 only.

Historical operating and maintenance labor requirements, chemical usage, and waste generation data were collected to perform the cost analysis.

TECHNOLOGY DESCRIPTION

The MART EQ-1 System is a process technology that chemically separates and clarifies the alkaline cleaner solution and encapsulates the waste for disposal. The MART process utilizes adsorption and electrostatic forces to encapsulate waste products. The chemical compound used in the MART encapsulating process is a non-hazardous proprietary product called Magic Dust, which is formulated to treat a range of specific contaminants in the waste stream based on the desired disposition of the effluent; e.g., recycling or discharge to a POTW. The MART EQ-1 unit is equipped with two connecting tanks made of sheet steel: a mixing/reaction tank (upper reservoir tank) and a holding tank (lower reservoir tank). The upper tank is of a trapezoidal design; this is where the untreated alkaline cleaner is pumped and the treatment chemical (Magic Dust) is added. Once the solution is thoroughly mixed, the encapsulated material is allowed to settle to the bottom of the upper tank. After encapsulation, the treated alkaline cleaner is allowed to pass through a filtration media (30 micron filter paper) into the lower tank. As the waste is collected on the filter paper, the paper is slowly pulled forward and wrapped around the encapsulated waste. As the encapsulated waste is rolled in the filter paper, the paper is squeezed to remove excess solution. This process is continued until all of the solution passes through the filter paper into the lower tank. The treated alkaline cleaner in the lower tank is transferred either to the FPS for further treatment or directly back into the parts washer. The FPS is a basic ion exchange system that utilizes a granular activated carbon filter along with a polymer resin chamber.

VERIFICATION OF PERFORMANCE

During each test period, grab samples were taken of the MART influent, effluent, and waste sludge. In addition, samples of standard cleaner make-up solutions were analyzed for comparison purposes, in order to understand the baseline analytical interference from the cleaner.

Analytical results for key parameters are shown in **Table i**. Alkalinity measures the key inorganic and organic ingredients of the alkaline cleaner. Total suspended solids, oil and grease (O&G), and cadmium are the contaminants being removed during the recovery process. **Table i** also contains the field measurements used to

measure the key ingredients of the alkaline cleaner (conductivity for Daraclean® (DCN) 282; refractive index for Daraclean® 235). The manufacturer of the Daraclean® alkaline cleaner recommends that conductivity and refractive index measurements be used to obtain the cleaner concentration of Daraclean® 282 and 235, respectively. It was found that the key ingredient of Daraclean® 282 is diethylene glycol monobutyl ether; therefore, it was analyzed during Test #3.

Table i shows the analysis results for influent, effluent, and waste sludge samples. The FPS was used for treating the Engine Compressor Wash because it was discharged to Publicly Owned Treatment Works (POTW) and not for the R&R (Tire Shop), Aircraft Ground Equipment (AGE), and Engine Shop parts washer cleaners because they are recycled. The results of sludge samples analyzed for oil and grease and total metals were not used due to lack of reliability in the data. Sample results were drastically different than duplicates and sample re-tests, which indicates that the results were not accurate or reproducible. The problem does not appear to lie with the analytical method, but is attributed to interference caused by the Magic Dust in the waste sludge. It is possible that the interference could be caused by the chemical structure of the Magic Dust being altered as it encapsulates the waste stream contaminants. Moreover, this may illustrate difficulties in obtaining a representative sludge sample. Additional investigation as to the extent of the Magic Dust's impact was not done because identification of the content and characteristic of the Magic Dust was believed to be outside the scope of the ETV-MF Center. Since the sludge analytical results were unusable, the oil and grease and cadmium concentrations were calculated using a simple batch mass balance (influent – effluent = sludge). Also, the conductivity is consistently higher in the effluent indicating an interference by the Magic Dust.

Sample ID	Total Alkalinity mg/L as CaCO ₃ (EPA 310.1)	Total Suspended Solids mg/L (EPA 160.2)	O&G mg/L (SM 5520B)	Cadmium mg/L (EPA 200.7)	Conductivity µS	Refractive Index % Brix	Glycol Ether mg/L
Test #1. Engine Compressor Wash							
MART Influent	280	370	370	6.5	1,314	NA	NA
FPS Influent	260	53	26	0.36	1,625 ¹	NA	NA
FPS Effluent	22	15	12.5	0.13	2.0	NA	NA
Waste Sludge (calculated)	NA	NA	32,337 µg/g	2,333 µg/g	NA	NA	NA
Test #2. R&R Parts Washer Alkaline Cleaner							
MART Influent	700	2,900	500	30.0	3,480	NA	NA
MART Effluent	520	62	160	27.0	5,960 ¹	NA	NA
Waste Sludge (calculated)	NA	NA	24,892 µg/g	332 µg/g	NA	NA	NA
Test #3. AGE Parts Washer Alkaline Cleaner							
AGE Influent	660	830	390	0.4	NA	NA	660
AGE Effluent	180	150	150	0.36	NA	NA	660
Waste Sludge (calculated)	NA	NA	35,000 µg/g	3 µg/g	NA	NA	NA
Test #4. Engine Shop Parts Washer Alkaline Cleaner							
MART Influent.	2,000	250	1,600	12.0	NA	1.4	NA
MART Effluent	2,000	140	1,000	11.0	NA	1.2	NA
Waste Sludge (calculated)	NA	NA	69,938 µg/g	174 µg/g	NA	NA	NA

MART Influent = Feed to the MART EQ-1 unit

MART Effluent = Recovered alkaline cleaner from MART EQ-1 unit

FPS Influent = Feed to the FPS

FPS Effluent = Effluent from FPS

SM = Standard Methods for the Examination of Water and Wastewater, 18th Ed.

EPA = Methods for Chemical Analysis of Water and Wastes, 1983

NA = Not Applicable

AVG = Average

1 = Magic Dust interference with conductivity measurement

Table i. Summary of Key Analytical Data

Alkaline Cleaner Recovery. The recovery percentages for the two Daraclean® cleaners were high (**Table ii**), indicating that the MART EQ-1 is efficient in recovering the cleaning chemistry. The recovery in Test # 2, greater than 100 percent, is due to additional ions associated with the Magic Dust when measuring for conductivity. For Test #3 GC/FID analysis for diethylene glycol monobutyl ether was performed instead of conductivity to determine the concentration of DCN 282. The GC/FID analysis is a better method of determining the concentration of the DCN 282. The Magic Dust was not specifically formulated for treating the AGE Parts Washer (Test #3). While recovery of DCN 282 was high, the alkalinity recovery was lower than in Tests #2 and 4.

Test No.	Total Alkalinity % Recovered	DCN 235 Cleaner % Recovered	DCN 282 Cleaner % Recovered
2	71	NA	163 ¹
3	26	NA	94
4	96	83	NA

NA – Not Applicable

1 = Magic Dust interferes with conductivity measurement

Table ii. Cleaner Recovery Efficiency

Contaminant Removal Efficiency. Contaminant removal efficiencies are calculated for the primary contaminants of the alkaline cleaning bath (O&G, cadmium, and TSS) and are shown in **Table iii**. For the four test runs, average O&G removal efficiency ranged from 40 to 97 percent, cadmium removal efficiency ranged from 12 to 98 percent, and TSS removal efficiency ranged from 46 to 98 percent. The MART EQ-1 System was more efficient during Test #1 when the FPS was used in the treatment of engine compressor cleaner and wash water for discharge to the POTW, in comparison to Tests #2, #3, and #4, when the FPS was not used to recycle parts washer aqueous alkaline cleaner.

Complete contaminant removal is not required to recycle alkaline cleaners. With Tests #2, #3, and #4 yielding satisfactory removal efficiencies for O&G, and TSS, and low contaminant removal efficiency for cadmium, the alkaline cleaner was effectively recycled.

Test No.	O&G % Removal	Cd % Removal	TSS % Removal
1	97	98	96
2	69	14	98
3	63	14	83
4	40	12	46

Table iii. Contaminant Removal Efficiency

Worker Exposure Monitoring. Exposure air monitoring was conducted during operation of the MART EQ-1 System and handling of the encapsulated waste to determine if there was a potential for exposure to cadmium and chromium. Testing consisted of monitoring during the G-130H engine compressor cleaning (Test #1) and R&R parts washer (Test #2) tests. In addition to cadmium and chromium, monitoring of silica was performed during Test #2 to assess the potential exposure to silica when handling the Magic Dust. National Institute of Occupational Safety and Health (NIOSH) protocols were used on all samples.

Table iv summarizes the results of the air monitoring. The Time Weighted Average (TWA) results are compared to the Permissible Exposure Limits (PEL).

Sampling Date	Sampling Location	Compound	TWA (mg/m ³)	PEL (mg/m ³)
1-25-01	Handling Waste	Cadmium	<0.0005	0.005
1-25-01	Handling Waste	Chromium	0.0002	0.5
1-31-01	Handling Waste	Cadmium	<0.0005	0.005
1-31-01	Handling Waste	Chromium	0.001	0.5
1-31-01	Magic Dust Weigh-up & Dispensing	Silica (Respirable)	<0.0044	0.05

Table iv. Air Monitoring Results

As noted above in the monitoring results, all samples are well within the recommended standards. The results indicate that there was no overexposure to the specific compounds during the treatment process.

Energy Use.

The electrical service required for the MART EQ-1 System at the 179th AW is 115 VAC and 17 amps. Energy usage was calculated by converting the system electrical service requirements (17 amps, 115 volts) into kilowatts and multiplying by the number of hours operated.

17 amps X 115 Volts = 1955 watts (1.955 kW)

The MART EQ-1 System operated for 26.33 hours during the first test run which included pumping the effluent through FPS system and for 14.19 hours during test runs 2 – 4, for a total of 40.52 hours. The estimated energy used for all four tests was:

1.955 kW X 40.52 hours = 79.2 kWh

Waste Generation. A waste generation analysis was performed using current operational data and historical records from the 179th AW. Implementation of the MART EQ-1 System has eliminated the need to dispose of the parts washer alkaline cleaning solutions and eliminated shipping the engine compressor cleaner and rinse water off-site for disposal. The parts washer alkaline cleaning solutions are recycled and the engine compressor wastewater is sent to the local POTW. Hazardous waste has been decreased from 700 gallons annually¹ of hazardous wastewater to a 50-gallon container of encapsulated waste. The overall volume of hazardous waste generated from alkaline cleaning has been reduced by 93 percent.

TCLP Metals	Cd (mg/L)	Cr (mg/L)	Pb (mg/L)	Ba (mg/L)	Ni (mg/L)	Cu (mg/L)
<i>Test #1</i>	<i>Engine Compressor Wash</i>					
Sludge Cake	8.8	<0.1	<0.1	<1.0	5.7	0.04
<i>Test #2</i>	<i>R&R Parts Washer Aqueous Alkaline Cleaner</i>					
Sludge Cake	3.4	<0.1	<0.1	<1.0	0.08	0.75
<i>Test #3</i>	<i>AGE Parts Washer Aqueous Alkaline Cleaner</i>					
Sludge Cake	0.12	<0.1	<0.1	<1.0	0.07	0.10
<i>Test #4</i>	<i>Engine Shop Parts Washer Alkaline Cleaner</i>					
Sludge Cake	1.1	<0.1	<0.1	<1.0	0.10	0.21

Table v. TCLP Metal Results

¹ The 700 gallons of waste annually is based on historical records from the 179th AW.

The sludge was analyzed to see if it could be classified as non-hazardous sludge. The results are shown in Table v. The AGE parts washer sludge passed the TCLP. The other parts washer sludge and the engine compressor wash sludge failed TCLP only for cadmium.

Operating and Maintenance Labor. Operating and maintenance (O&M) labor requirements for the MART EQ-1 System were monitored during testing. It takes approximately three labor hours to process one batch of alkaline cleaner. Historical and current operational data show that 0.7 hrs/wk of O&M labor is required for the system. O&M tasks include system processing alkaline cleaner, handling encapsulated waste, changing filter cartridges and resin, cleaning the system for winter storage, and performing unexpected maintenance for part replacements.

Cost Analysis. A cost analysis of the MART EQ-1 System was performed using current operating costs and historical records from the 179th AW. The installed capital cost (1998) of the unit was \$9,100 (includes \$6,100 for the basic EQ-1 unit, \$2,800 for the optional FPS, and \$200 for the feed pump and associated industrial hoses). The annual cost savings associated with the unit is \$3,209. The projected payback period is 2.8 years.

SUMMARY

The test results show that the MART EQ-1 System provides an environmental benefit by reducing off-site hazardous waste disposal by 93 percent. The treated alkaline cleaner was able to be recycled and reused since contaminants were sufficiently removed, yet the cleaner constituents were not significantly removed. The economic benefit associated with this technology is low O&M labor and a payback period of approximately 2.8 years. As with any technology selection, the end user must select appropriate cleaning equipment and chemistry for a process that can meet their associated environmental restrictions, productivity, and cleaning requirement.

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1.0 INTRODUCTION

The MART EQ-1 Wastewater Processing System (MART EQ-1 System) is a batch treatment process that removes contaminants from an aqueous alkaline cleaner in one step. The MART EQ-1 System consists of the EQ-1 unit (**Figure 1**) and an optional Final Polishing System (FPS). The EQ-1 unit employs a proprietary chemical called “Magic Dust” to perform the separation of contaminants such as oil and grease (O&G) and metals from aqueous cleaning solutions. The treatment process utilizes adsorption and electrostatic forces to encapsulate waste products such as paint, solid and dissolved metals (e.g., lead, cadmium, chromium), dust, oil, minerals, and asbestos. The encapsulated material (processed waste) cures and sets up like hardened dough or concrete. The treated alkaline cleaner is recycled.



Figure 1. The MART EQ-1™ Unit

The verification test evaluated the ability of the MART EQ-1 System to sufficiently remove O&G, metals, and suspended solids to recover the alkaline cleaning chemistry, or to treat the alkaline cleaner for discharge to the Publicly Owned Treat Works (POTW). It was tested by CTC under the U.S. Environmental Protection Agency (EPA) Environmental Technology Verification Program for P2 Metal Finishing Technologies (ETV-MF). The purpose of this report is to present the results of the verification test.

The MART EQ-1 System was tested to evaluate and characterize its operation, through measurement of various process parameters. Testing was conducted at the 179th AW Unit located in Mansfield, Ohio. The 179th AW is an Ohio Air National Guard (OANG) unit that has Federal, state, and community roles. The major activities performed at the OANG include aircraft maintenance, aerospace ground equipment maintenance, ground vehicle maintenance, and facilities maintenance.

2.0 TECHNOLOGY DESCRIPTION

2.1 Theory of Operation

The MART EQ-1 System is an inventive technology that chemically separates and clarifies the aqueous alkaline cleaner solution and encapsulates the waste for disposal. The treatment process utilizes adsorption and electrostatic forces to encapsulate waste products. The chemical compound used in the treatment process is a non-hazardous proprietary product called Magic Dust. Each Magic Dust formula is developed to treat a range of specific contaminants in the waste stream based on the desired disposition of the effluent; e.g., recycling or discharge to a POTW. The quantity of Magic Dust added may vary based on whether the waste stream, at the time of treatment, is below or above this contaminant load range.

The effectiveness of the treatment process is based on the performance of the Magic Dust. The Magic Dust is a blend of clay, polymeric, acidic, and various other additives that allow the compound to integrate several reactions in one. The function of the Magic Dust is as follows: (1) The acidic components cause oily contaminants to coalesce and separate from the alkaline cleaner; (2) the polymeric cationic portion attracts any remaining oils and the larger, more highly charged anions; (3) the third component group precipitates metallic hydroxides and drives the system to a fully flocculated condition where the clay particles attract the cationic polymer molecules (with absorbed oil), metallic ions and positively charged contaminants; and (4) the heavy metal cations still remaining in solution exchange with sodium in the clay and electrostatically bond to the clay platelets. The fully reacted mass is a complex mixture of encapsulated contaminants and waste solids that are held together by van der Waals as well as electrostatic forces. The clay particles agglomerate, completely entrapping and surrounding suspended solids. Pozzolanic reactions also occur, which form cement-like particles that settle to the bottom of the reaction vessel.

The Magic Dust is added to the alkaline cleaner and the agglomerate is mixed to cause the necessary complex reactions and microencapsulation: molecules with adsorbed oil, metallic ions, and charged contaminants are attracted to the Magic Dust to form a mass. The Magic Dust formulation also includes chemistry to demineralize the treated alkaline cleaner. After microencapsulation, the flocculated waste is filtered through a disposable media paper to collect the waste for disposal. The encapsulated waste is collected in the filter paper, and the clarified solution is collected in a holding tank. The filter paper containing the encapsulated waste is rolled up and allowed to harden into a cement-like material. The filter paper and waste material are put into a drum and disposed of off-site as hazardous waste. The clarified solution can be recycled and reused or treated further with an optional FPS and discharged to the sanitary sewer. The FPS is a basic ion exchange system that utilizes a granular activated carbon filter along with a polymer resin chamber, which employs polystyrene beads with sodium ions as the resin media. The carbon filter removes O&G and other contaminants that may hinder the effectiveness of the resin. Next, the solution is sent through the resin chamber, where heavy metals are removed.

2.2 Equipment and Flow Diagram

The MART EQ-1 System is equipped with two connecting tanks (**Figure 2**): a mixing/reaction tank (upper reservoir tank) and a holding tank (lower reservoir tank). Each tank is made of sheet steel and has a capacity of 125 gallons. The upper tank is a trapezoidal design where the untreated alkaline cleaner is pumped and the treatment chemical (Magic Dust) is added. Once the solution is thoroughly mixed, the encapsulated material is allowed to settle to the bottom of the mixing/reaction tank. A sight glass is provided on this tank so that the separation/encapsulation process can be observed.

After encapsulation, the treated alkaline cleaner is allowed to drain into the holding tank. The treated alkaline cleaner flow is controlled by two separate ball valves located at the bottom of the upper tank. Both valves are two inches in diameter and are operated manually. The standpipe valve controls the flow of the clarified solution and light flocculation, and the bottom valve controls the flow of heavy precipitation. The standpipe, located on the inside of the upper tank, can be cut to adjust the height of the pipe to the depth of the flocculated material.

All treated alkaline cleaner is allowed to pass through a filtration media (30 micron filter paper) before entering the holding tank. The EQ-1 System contains a grated metal filter pan, directly below the upper tank, to hold the filter media. The filter media is constructed of rayon fiber and collects the treatment chemical with the encapsulated waste. As the waste is collected on the filter paper, the paper is slowly pulled forward and wrapped around the encapsulated waste. When the waste has been sufficiently wrapped, the filter paper is cut. The encapsulated waste is removed and placed in the drying tray, which is located on the right side of the unit. This process is repeated until all of the alkaline cleaner has been processed. As the encapsulated waste is rolled in the filter paper, the paper is squeezed to remove excess solution. The clarified solution in the holding tank is transferred with a submersible pump to the FPS, which is an optional secondary treatment.

The FPS is a basic ion exchange system. The system is cationic, and polystyrene beads with sodium ions are used for the resin media. The FPS includes a granular activated carbon filter along with a polymer resin chamber. The clarified solution enters the prefilter carbon media to remove O&G, and other contaminants. The filtered solution then enters the ion exchange chamber, where the metal ions are removed by being captured on the beads. The prefilter chamber is 3' in diameter, 25" tall, and requires one 20" – 15 micron filter cartridge. The refillable resin chamber has a polyvinyl chloride (PVC) shell with a 250-micron polypropylene strainer. The strainer prevents resin migration with the solution. The resin has a 2 pounds (lbs) per 1.0 cubic feet (ft³) capacity. The specification for the FPS is 72 gallons per hour (gph) or 1-2 gallons per minute (gpm) for maximum removal efficiency.

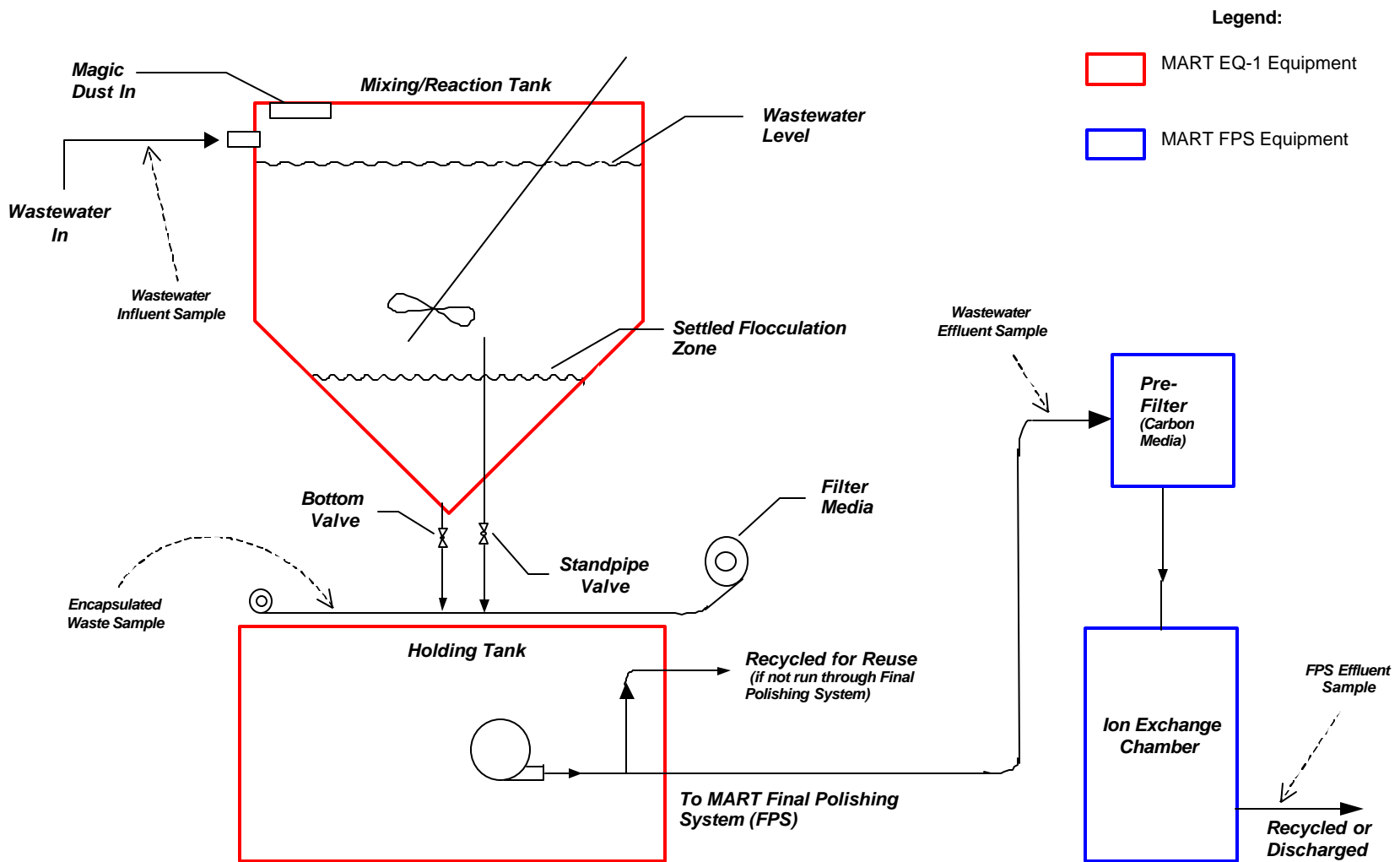


Figure 2. The MART EQ-1 Schematic

2.3 Test Site Installation

The test site selected for verification of the MART EQ-1 System was the OANG 179th AW Unit in Mansfield, Ohio. The 179th AW has a 52-year history from the early days organizing the unit and flying fighters, to their present day situation as a first string member of the Total Force and flying the C-130 Hercules (C-130H) aircraft. The 179th AW is an Air Force (AF) ANG comprised of 950 personnel, with approximately 250 being full-time. Their primary mission is to provide airlift capabilities for the State of Ohio and the rest of the United States if needed.

The 179th AW utilizes the C-130H transport in their daily airlift capabilities operations. The 179th AW cleans the engines on their eight C-130H aircraft at least once each year as preventative maintenance to ensure maximum performance, as well as aircraft and aircrew safety. In 1993, cadmium was detected in the engine compressor wash wastewater. The cadmium was believed to be coming from the cadmium-plated internal compressor blades in the C-130H aircraft engine. At that time, most of the Department of Defense (DOD) facilities were not collecting their spent wash wastewater. Consequently, in 1994 the ANG Headquarters (HQ) instructed all C-130H bases to stop aircraft engine washing until a collection system could be developed. In 1997, engine compressor washing resumed. The spent engine wash cleaner and rinsate were collected and drummed as hazardous waste, using a wastewater collection container.

The spent wash wastewater collected from the cleaning of the C-130H engines has the potential to generate large quantities of hazardous waste annually at each ANG base. The 179th AW realized this environmental impact and began implementing a program to treat the C-130H engine compressor spent wash wastewater at their site, as well as their spent aqueous parts washer cleaners.

2.3.1 The 179th AW C-130H Engine Cleaning Process

It is a requirement at the 179th AW to wash the C-130H aircraft engines at least once each year to ensure maximum performance and aircraft and aircrew safety. The cleaning process used at the 179th AW is as follows:

- Soap application (soak for five minutes)
- Soap application again (soak for 20 minutes)
- Two clean water rinses

The aircraft cleaning solution used is Eldorado ED-563. The entire cleaning process generates no more than 10 gallons of alkaline cleaner/rinsate per engine and no more than 40 gallons per plane. This results in the generation of approximately 640 gallons of wastewater per year at the 179th AW base. The cleaner/rinsate mixture is comprised of approximately 94 percent water, five percent alkaline cleaner, and one percent cadmium and O&G. **Table 1** presents background analysis of engine wash wastewater sample taken before treatment. It was collected by the 179th AW on October 20, 1997, and tested by Clayton

Laboratory Services. The spent wash wastewater is hazardous because it contains 11 parts per million (ppm) of cadmium. The cadmium in the wastewater comes from the cadmium-plated internal compressor blades of the engine. The O&G in the wastewater comes from the engine. It is estimated that the concentration of contaminants in this spent wash wastewater remains relatively constant, because the frequency of C-130H engine cleaning is determined based on the number of hours the engine is in service.

Constituent	Unit	Parameter
Cadmium (Cd)	ppm	11
O&G	ppm	2500
pH	pH units	7.1

Table 1. Spent Engine Cleaning Wash Wastewater Background Analysis

After the four C-130H aircraft engines on each plane are cleaned, the cleaning solution and rinsate are collected in a large 500 gallon plastic polystyrene collection container (Figure 3) and transported to the MART EQ-1 System. The treated engine wash wastewater is discharged to the POTW, after analysis confirms that the treated water meets permit requirements.



Figure 3. The 179th AW Wash Wastewater Collection Container

2.3.2 The 179th AW Parts Washer Cleaning Process

There are three part washers at the 179th AW, each of which utilizes an aqueous alkaline cleaner. A description summary of the washers is presented in **Table 2**. The alkaline cleaners are treated individually using the MART unit. The spent alkaline cleaners contain contaminants that are primarily cadmium (Cd), chromium (Cr), paint chips, and O&G. Some of the minor contaminants include lead (Pb), barium (Ba), nickel (Ni), and copper (Cu). The spent alkaline cleaner concentration varies depending on the type and quantity of contaminants on the parts and age of the cleaning solution. After treatment in the MART system, the recovered alkaline cleaner is pumped back into the parts washer reservoir for reuse.

Parts Washer	Size (Liters)	Alkaline Cleaner	Use	Contaminants
Engine Shop (MART Tornado 40)	680	Daraclean® 235	Aircraft engine panels	Cd, Cr, Cu, Pb, O&G
Aircraft Ground Equipment (AGE) (MART Cyclone 30)	490	Daraclean® 282	Burner cans from engine heater	Cd, Cr, Pb, Ba, O&G
R&R (Tire Shop) (MART Cyclone 30)	490	Daraclean® 282	Rims, bolts, & various brake components	Cd, Cr, Cu, Ni, Ba, O&G

Table 2. Parts Washers at the 179th AW

3.0 METHODS AND PROCEDURES

3.1 Test Objectives

The overall goal of the verification test was to evaluate the ability of the MART EQ-1 System to separate O&G, metals, and suspended solids from the spent cleaning solution. This technology was evaluated under actual production conditions, and the operation of the unit was characterized through the measurement of various process control factors.

The following is a summary of specific project objectives. **Table 3** describes these objectives and how they relate to the test measurements for evaluation of the MART EQ-1 System.

Under normal system operating set-points at the 179th AW and varying contaminant-loading rates:

- Prepare a material balance for waste alkaline cleaner constituents (oils and metals) in order to:
 - 1) Evaluate the ability of the MART EQ-1 System to remove O&G and metals.
 - 2) Evaluate the ability of the MART EQ-1 System to recycle alkaline cleaner solution.
- Determine the cost of operating the system for the specific conditions encountered during testing.
 - 1) Determine labor requirements needed to operate and maintain the MART EQ-1 System.
 - 2) Determine the quantity of energy consumed by the MART EQ-1 System during operation.
- Quantify the environmental benefit by determining the potential for reduction in alkaline cleaner disposal frequency.

3.2 Test Procedure

3.2.1 System Set-Up

Prior to startup, the MART EQ-1 System was scrubbed to remove residue and flushed with tap water. The walls of the upper and lower tanks were rinsed, and all associated lines, pumps, and valves were flushed. The discharge of the flushing was allowed to drain on the filter paper and was appropriately disposed of.

3.2.2 Testing

The MART EQ-1 System was tested in accordance with the verification test plan [Ref. 1]. Deviations to the verification test plan were documented using a Test Plan Modification Request. Testing was planned on four distinct processes.

During the first test, the MART EQ-1 System was operated using normal operating conditions found at the 179th AW (section 2.3.1). A “typical” level of contamination was found in the spent engine wash alkaline cleaner/rinsate, which was used for this test. This “typical” level was defined as the normal contamination load in the wastewater after being used to clean the C-130H engine.

During the second, third and fourth tests, the MART EQ-1 System was operated using normal operating conditions found at the 179th AW (section 2.3.2). Test #2 evaluated the ability of the MART EQ-1 to remove contaminants in the R&R parts washer alkaline cleaner and recover the cleaner. Test #3 evaluated the ability of the MART EQ-1 to remove contaminants in the Aircraft Ground

Equipment (AGE) parts washer alkaline cleaner and recover the cleaner. Test #4 evaluated the ability of the MART EQ-1 to remove contaminants in the Engine Shop parts washer alkaline cleaner and recover the same. The alkaline cleaner from the parts washers has historically contained a higher concentration of heavy metals, specifically cadmium, than the engine cleaning alkaline cleaner. The AGE Department at the 179th AW unit leaves their parts washer on at all times, and it is used rather infrequently.

Test	Test Objective	Test Measurement
1. Typical contaminant loading rate found in the C-130H engine alkaline cleaner.	Prepare a material balance for aqueous alkaline cleaner constituents (oils and metals).	<ul style="list-style-type: none"> • Chemical characteristics of feed solution. • Chemical characteristics of recovered product. • Volume and chemical characteristics of wastes removed from alkaline cleaner. • Quantity of fresh cleaning chemicals added during testing.
	Evaluate the ability of the MART system to process spent cleaner solution and separate usable cleaner solution chemistry from contaminants.	<ul style="list-style-type: none"> • Chemical characteristics of feed solution. • Chemical characteristics of recovered product.
	Determine the cleaner recovery rate of the system, normalized based on production throughput and contamination loading.	<ul style="list-style-type: none"> • Volume of product produced. • Production throughput for alkaline cleaner. • Contaminates loading.
	Determine labor requirements needed to operate and maintain the MART system.	<ul style="list-style-type: none"> • O&M labor required during the test.
	Determine the quantity of energy consumed by the MART system during operation.	<ul style="list-style-type: none"> • Quantity of energy used by pumps and mixer.
	Determine the cost of operating the alkaline cleaner recycle system for the specific conditions encountered during testing.	<ul style="list-style-type: none"> • Costs of O&M labor, materials, and energy required during test. • Quantity and price of fresh cleaning chemicals added during testing.
	Determine if worker exposure is elevated, as a result of operating the MART system.	<ul style="list-style-type: none"> • Perform air monitoring at a low and high contaminants load level.
	Quantify/identify the environmental benefit.	<ul style="list-style-type: none"> • Review historical waste disposal records and compare to current practices.
2. High contaminant loading rate using the R&R parts washer alkaline cleaner.	Same as above.	Same as above.
3. High contaminant loading rate using the AGE parts washer alkaline cleaner.	Same as above, except worker exposure analysis not performed.	Same as above, except air monitoring not performed.
4. High contaminant loading rate using the Engine Shop parts washer alkaline cleaner.	Same as above, except worker exposure analysis not performed.	Same as above, except air monitoring not performed.

Table 3. Test Objectives and Related Test Measurements for Evaluation of the MART EQ-1System

Samples and process measurements for the R&R parts washer and the Engine Shop parts washer were taken according to the frequency presented in **Table 4**. For the engine compressor wash, three samples for all parameters plus two extra O&G (total of five) were collected. In addition, three samples for all parameters plus two extra O&G (total of five) were collected from the FPS during verification testing of the engine compressor wash.

Sample Name	Sample Location	Frequency/ Type	Analytical Parameters
Alkaline Cleaner Influent	Alkaline Cleaner In MART EQ-1 Unit	2 grab samples/batch	O&G, TSS, Alkalinity, Cd, Cr, Pb, Ba, Ni, Cu, Conductivity*, Refractive Index*, Glycol Ether*
Alkaline Cleaner Effluent/FPS Influent	Alkaline Cleaner Out MART EQ-1 Unit	2 grab samples/batch	O&G, TSS, Alkalinity, Cd, Cr, Pb, Ba, Ni, Cu, Conductivity*, Refractive Index*, Glycol Ether*
Encapsulated Waste	Filter Pan	2 grab samples/batch	O&G, Cd, Cr, Pb, Ba, Ni, Cu, TCLP Metal

* Refractive index was measured when Daraclean® 235 was used. Conductivity or glycol ether was measured when Daraclean® 282 was used.

Table 4. Sampling Frequency and Analytical Parameters

3.2.3 Air Monitoring

Worker exposure air monitoring was conducted according to the verification test plan [Ref. 1] during operation of the MART EQ-1 System and handling of the encapsulated waste to determine if there was a potential for exposure to cadmium and chromium. Testing consisted of monitoring during the C-130H engine cleaning and R&R parts washer tests. In addition to cadmium and chromium, monitoring of silica was added during Test #2 – treatment of the R&R parts washer alkaline cleaner. Silica was added, because it was suspected that there was a potential exposure to silica when handling the Magic Dust. One 15 minute Short-Term Exposure (STE) sample for crystalline silica respirable dust was collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 7300.

3.3 Quality Assurance/Quality Control (QA/QC)

3.3.1 Data Entry

A Project Team member recorded field sampling events and process measurements on pre-designed forms (**Appendix A**). Sample identification numbers were created for each test and recorded in the field logbook, along with calibration details and all other data collected in the field.

3.3.2 Sample Collection and Handling

Prior to the verification test, the need for sampling ports was evaluated, and it was determined that the sampling ports and locations were sufficient without further modification of the MART EQ-1 System. When possible, grab samples were collected directly into their respective sampling containers. When not possible, a 1000-mL high-density polyethylene (HDPE) sampling beaker was used to collect the sample, which was then poured into its respective sample container. During sampling, the sample collection containers were kept cool by placing them in a cooler containing ice packs.

Samples collected during the verification test were stored in a chemical refrigerator until they were packaged for shipment. Samples shipped to the analytical laboratories were packed in coolers containing ice packs and bags of ice. All shipments were secured with strapping tape and security seals and accompanied by chain of custody (COC) forms.

A summary of the sample analysis and handling requirements that were followed during the verification test can be found in **Table 5**.

Parameter	Test Method	Sample Bottle	Sample Volume Required	Preservation/ Handling	Hold Time
Oil/Grease Aqueous	SM Method 5520B	Glass jar	1000 mL	4°C Acidify to pH < 2 w/HCl	28 days
Oil/Grease Solids	SM 5520E/ 5520B	Glass jar	500 g	4°C	28 days
Total Alkalinity	EPA Method 310.1	Glass jar	500 mL	4°C	Analyze as soon as practical
Diethylene Glycol Monobutyl Ether	GC/FID (See Appendix E)	Amber glass jar	250 mL	4°C	28 days
TSS	EPA Method 160.2	Polyethylene	500 mL	4°C	7 days
Metals Aqueous	EPA Method 200.7	Polyethylene	500 mL	Acidify to pH < 2 w/HNO ₃	6 months
Metals Solids	SW-846 3050B/6010B	Polyethylene	500 g	4°C	6 months
TCLP Metals	SW 846 Method 1311/3010A/ 6010B	Polyethylene	500 g	4°C sample/ Acidify extract to pH < 2 w/HNO ₃	6 months

GC/FID = Gas Chromatography/Flame Ionization Detector

Table 5. Summary of Analysis and Handling Requirements

3.3.3 Calculation of Data Quality Indicators

Data reduction, validation, and reporting were conducted according to the verification test plan [Ref. 1] and the ETV-MF Quality Management Plan (QMP) [Ref. 2]. Calculations of data quality indicators are discussed in this section.

3.3.3.1 Precision

Precision is a measure of the agreement or repeatability of a set of replicate results obtained from duplicate analyses made under identical conditions. Precision is estimated from analytical data and cannot be measured directly. To satisfy the precision objectives, the replicate analyses must agree within defined percent deviation limits, expressed as a percentage, calculated as follows:

$$\text{RPD} = \{(|X_1 - X_2|)/(X_1 + X_2)/2\} \times 100\% = \left\{ \frac{|X_1 - X_2|}{\frac{(X_1 + X_2)}{2}} \right\} \times 100\%$$

where:

X_1 = larger of the two observed values

X_2 = smaller of the two observed values

The analytical laboratories performed a total of 64 precision evaluations on test samples. All of the aqueous samples were within the precision limits of the verification test plan [Ref. 1]. One TCLP sample (zinc) did not meet the precision limits. 98.5 percent of the precision evaluation met each analyte's precision limits. The results of the precision calculations are summarized in **Appendix B**.

3.3.3.2 Accuracy

Accuracy is a measure of the agreement between an experimental determination and the true value of the parameter being measured. Analyses with spiked samples were performed to determine percent recoveries as a means of checking method accuracy. The percent recovery (P), expressed as a percentage, is calculated as follows:

$$P = [(SSR - SR)/SA] \times 100\%$$

where:

SSR = spiked sample result

SR = sample result (native)

SA = the concentration added to the spiked sample

QA objectives are satisfied for accuracy if the average recovery is within the range identified in **Table 7** of the verification test plan [Ref. 1]. The

analytical laboratories performed 72 accuracy evaluations. There were 68 samples or 94.4 percent that were within the limits. The results of the accuracy calculations are summarized in **Appendix C**.

3.3.3.3 Completeness

Completeness is defined as the percentage of measurements judged to be valid (met precision, accuracy, and representativeness) compared to the total number of measurements made for a specific sample matrix and analysis. Completeness, expressed as a percentage, is calculated using the following formula:

$$\text{Completeness} = \frac{\text{Valid Measurements}}{\text{Total Measurements}} \times 100\%$$

QA objectives are satisfied if the percent completeness is 90 percent or greater. There were 334 total measurements, and 304 of them were valid. This gives 91.0 percent completeness. Therefore, the total completeness objective was satisfied. However, there were 121 total measurements for the solids; 105 of them were valid, which gives 86.8 percent completeness. The sludge samples were analyzed for oil and total metals. The measurements were not used to make conclusions about the efficiency of the MART EQ-1 System.

3.3.3.4 Comparability

Comparability is a qualitative measure designed to express the confidence with which one data set may be compared to another. Sample collection and handling techniques, sample matrix type, and analytical method all affect comparability. Comparability was achieved during this verification test by the use of consistent methods during sampling and analysis and traceability of standards to a reliable source.

3.3.3.5 Representativeness

Representativeness refers to the degree to which the data accurately and precisely represent the conditions or characteristics of the parameter. For this verification project, one duplicate sample was collected in the field for each sample location during Test #1, #3, and #4 and sent to the laboratory for analysis. The results are shown in **Appendix D**.

3.3.3.6 Sensitivity

Sensitivity is the measure of the concentration at which an analytical method can positively identify and report analytical results. The sensitivity of a given method is commonly referred to as the detection

limit. Although there is no single definition of this term, the following terms and definitions of detection were used for this project.

Instrument Detection Limit (IDL) is the minimum concentration that can be differentiated from instrument background noise; that is, the minimum concentration detectable by the measuring instrument.

Method Detection Limit (MDL) is a statistically determined concentration. It is the minimum concentration of an analyte that can be measured and reported with 99 percent confidence that the analyte concentration is greater than zero, as determined in the same or a similar sample matrix. In other words, this is the lowest concentration that can be reported with confidence. The MDL for the metal sludge sample varies for each individual metal analyte and sludge sample. This is due to the percent moisture in the sludge and is calculated as follows:

$$\text{Sludge MDL} = \text{Standard MDL} \times (100\% \text{ Solids}) \times \text{Dilution Factor}$$

The MDLs for this verification project are shown in **Table 6**.

Critical Measurements	Matrix	Method	Reporting Units	Method of Determination	MDL
O&G	Water	SM 5520B	mg/L	Gravimetric	1.0
O&G	Solids	SM 5520E/5520B	µg/g	Gravimetric	1.0
Total Metals	Water	EPA 200.7	mg/L	ICP-AES	0.01 – 0.0005*
Total Metals	Solids	SW846 3050B/6010B	µg/g	ICP-AES	1.3 – 0.05*
TCLP Metals	Solid	SW846 1311/3010A/6010B	mg/L	ICP-AES	1.0 – 0.01*
TSS	Water	EPA 160.2	mg/L	Gravimetric	1.0
Total Alkalinity	Water	EPA 310.1	mg/L	Titration	1.0
Glycol Ether	Water	GC/FID (See Appendix E)	mg/L	GC/FID	20.0

*MRL – depends on the individual analyte

Table 6. Laboratory Methodology Information

4.0 VERIFICATION DATA

4.1 Analytical Results

A complete summary of analytical data is presented in **Table 7**. The samples coded “influent” are grab samples of the feed stream to the MART EQ-1 System and/or MART FPS, and those coded “effluent” are grab samples of the recovered permeate.

QA parameters were evaluated during Test #1, #3, and #4, which included duplicates, matrix spikes, and spike duplicates. The “Standard Solutions” samples are standard

cleaner make-up solutions that were made in the field for comparison purposes, in order to understand the baseline analytical interference from the cleaner. These samples represent the concentration of the constituents in a freshly formulated aqueous cleaner bath (the aqueous cleaning solution for the Engine Compressor is formulated with a 5.5 percent solution of ED 563, and the R&R, AGE, and Engine Shop parts washers are formulated with a 13 percent solution of DCN 282, DCN 282, and DCN 235, respectively).

	Total Alkalinity (mg/L as CaCO3)	TSS (mg/L)	Total O&G (mg/L)	Total Metals Ba (mg/L)	Total Metals Cd (mg/L)	Total Metals Cr (mg/L)	Total Metals Cu (mg/L)	Total Metals Ni (mg/L)	Total Metals Pb (mg/L)	Glycol Ether (mg/L)
<i>Test #1 Engine Compressor Wash</i>										
EQ-1 Influent	280	370	370	0.17	6.50	0.20	0.35	7.50	0.08	NA
EQ-1 Influent – Duplicate	300	370	490	0.12	5.50	0.17	0.31	7.60	0.08	NA
FPS Influent	260	53	26.0	0.0034	0.36	<0.001	0.035	0.94	<0.01	NA
FPS Influent – Duplicate	260	54	33.0	0.0039	0.36	<0.001	0.035	0.93	<0.01	NA
FPS Effluent	22	15	12.5	0.0051	0.13	<0.001	0.017	0.64	<0.01	NA
FPS Effluent – Duplicate	20	26	11.5	0.0045	0.14	<0.001	0.015	0.67	<0.01	NA
<i>Test #2 R&R Parts Washer Alkaline Cleaner</i>										
EQ-1 Influent	700	2,900	500	0.34	30.0	1.10	13.0	1.1	7.30	NA
EQ-1 Effluent	520	62	160	0.0073	27.0	0.054	6.3	1.0	2.90	NA
<i>Test #3 AGE Parts Washer Alkaline Cleaner</i>										
AGE Influent	660	830	390	1.4	0.40	0.72	1.5	1.0	2.3	660
AGE Influent – Duplicate	550	700	390	1.4	0.42	0.73	1.5	1.0	2.4	640
AGE Influent – Duplicate	NA	NA	410	1.3	0.40	0.69	1.4	0.9	2.1	NA
AGE Effluent	180	150	150	0.0098	0.360	<0.001	0.260	0.800	1.10	660
AGE Effluent Duplicate	200	170	130	0.0089	0.354	<0.001	0.258	0.772	1.12	650
AGE Effluent Duplicate	NA	NA	130	0.0099	0.350	<0.001	0.260	0.780	1.10	NA
<i>Test #4 Engine Shop Parts Washer Alkaline Cleaner</i>										
EQ-1 Influent	2,000	250	1,600	0.18	12.0	<0.001	1.10	1.80	0.12	NA
EQ-1 Influent – Duplicate	2,000	250	1,600	0.17	12.0	<0.001	1.10	1.10	0.13	NA
EQ-1 Effluent	2,000	140	1,000	0.012	11.0	<0.001	1.20	1.10	0.11	NA
EQ-1 Effluent – Duplicate	2,000	180	1,100	0.035	11.0	<0.001	1.00	1.10	0.12	NA
<i>Standard Solutions Cleaner Standard Make-up Solutions</i>										
Engine Compressor – 5.5% ED 563 Make-up	800	420	240	0.059	<0.0005	<0.001	0.18	<0.005	<0.01	NA
R&R Parts Washer – 13% DCN 282 Make-up	3,100	2	680	0.039	0.0007	<0.001	0.35	0.032	<0.01	NA
AGE Parts Washer – 13% DCN 282 Make-up	3,100	<1	720	0.039	0.0008	<0.001	0.36	0.033	<0.01	NA
Engine Shop Parts Washer – 13% DCN 235 Make-up	2,500	37	8,600	0.037	<0.0005	<0.001	0.33	<0.005	<0.01	NA

NA = Not Applicable

Table 7. Summary of Analytical Results

The primary contaminants of the alkaline cleaner streams are total suspended solids, heavy metals, and oil.

The “sludge” samples were grab samples taken from the bottom valve of the EQ-1 upper tank once the permeate solution was removed. Sludge samples analyzed for O&G and total metals were not used due to lack of reliability in the data. The O&G and metals results did not meet the relative percent different limits which indicates that the results were not reproducible as shown below in **Table 8**. Consequently, the concentration of oil and grease and cadmium in the sludge (primary contaminants of the alkaline cleaner baths) were calculated using a simple batch mass balance (influent – effluent = sludge) for the verification statement and not the laboratory data below. Obtaining the concentration of the sludge contaminants in this manner eliminated the ability to calculate the mass balance.

	O&G (mg/g)	Ba (mg/g)	Cd (mg/g)	Cr (mg/g)	Cu (mg/g)	Ni (mg/g)	Pb (mg/g)
<i>Test #1 Engine Compressor Wash</i>							
Sludge	70000	230	720	39	39	880	28
Sludge - Duplicate	35000	180	840	36	41	950	31
<i>Test #2 R&R Parts Washer Aqueous Alkaline Cleaner</i>							
Sludge	17000	200	520	89	980	20	900
<i>Test #3 AGE Parts Washer Aqueous Alkaline Cleaner</i>							
Sludge Cake	9000	110	3.6	24	39	16	41
Sludge – Duplicate	1200	100	3.6	28.7	45.1	18.9	45.5
<i>Test #4 Engine Shop Parts Washer Alkaline Cleaner</i>							
Sludge	620	220	160	4.2	140	20	40
Sludge – Duplicate	410	160	150	11	150	18	35

Table 8. Summary of Sludge Results

The sludge was checked to see if it could be classified as non-hazardous sludge using SW846 Method 1311/3010A/6010B (TCLP). The AGE parts washer sludge passed TCLP. The other sludge passed the leaching test except for cadmium. The cadmium values were above the 1.0 mg/L, Maximum Allowable Concentration for cadmium. The Magic Dust was unable to encapsulate all of the cadmium particles. Therefore, the sludge from the cleaner at the OANG 179th Unit was classified as hazardous. TCLP results from the waste sludge are summarized in **Table 9**.

TCLP Metals	Cd (mg/L)	Cr (mg/L)	Pb (mg/L)	Ba (mg/L)	Ni (mg/L)	Cu (mg/L)
<i>Test #1</i>	<i>Engine Compressor Wash</i>					
Sludge Cake	8.8	<0.1	<0.1	<1.0	5.7	0.04
Sludge Cake – Duplicate	9.0	<0.1	<0.1	<1.0	6.6	0.04
<i>Test #2</i>	<i>R&R Parts Washer Aqueous Alkaline Cleaner</i>					
Sludge Cake	3.4	<0.1	<0.1	<1.0	0.08	0.75
<i>Test #3</i>	<i>AGE Parts Washer Aqueous Alkaline Cleaner</i>					
Sludge Cake	0.12	<0.1	<0.1	<1.0	0.07	0.10
Sludge Cake – Duplicate	0.11	<0.1	<0.1	<1.0	0.07	0.10
<i>Test #4</i>	<i>Engine Shop Parts Washer Alkaline Cleaner</i>					
Sludge Cake	1.1	<0.1	<0.1	<1.0	0.10	0.21
Sludge Cake – Duplicate	0.99	<0.1	<0.1	<1.0	0.09	0.18

Table 9. Summary of TCLP Metal Results

4.2 Air Monitoring Results

Worker exposure air monitoring was conducted during operation of the MART EQ-1 System and handling of the encapsulated waste to determine if there was a potential for exposure to cadmium and chromium. The air monitoring was conducted in accordance with the NIOSH Method 7300. Testing consisted of monitoring during the C-130H engine compressor cleaning (Test #1) and R&R parts washer (Test #2) tests. In addition to cadmium and chromium, monitoring of silica was performed during Test #2 to assess the potential exposure to silica when handling the Magic Dust.

The table below, **Table 10**, summarizes the results of the air monitoring. The TWA results are compared to the PELs.

Sampling Date	Sampling Location	Compound	TWA (mg/m ³)	PEL (mg/m ³)
1-25-01	Handling Waste	Cadmium	<0.0005	0.005
1-25-01	Handling Waste	Chromium	0.0002	0.5
1-31-01	Handling Waste	Cadmium	<0.0005	0.005
1-31-01	Handling Waste	Chromium	0.001	0.5
1-31-01	Magic Dust Weigh-up & Dispensing	Silica (Respirable)	<0.0044	0.05

Table 10. Air Monitoring Results

All samples were below the recommended limits. The results indicate that there was no overexposure to the specific compounds during the treatment process.

4.3 Process Measurements

Certain process measurements were taken on field samples during each verification test. These data have been consolidated and are summarized in **Table 11**. Solution

temperature measurements were taken using a hand-held digital thermometer, and pH was obtained using pH water test strips. Conductivity (Cond.) measurements were taken using a hand-held digital analyzer, and a refractometer was used to obtain refractive index (RI) measurements.

Feed volumes were obtained using the level indicator on the MART EQ-1 upper tank. The ultrasonic flowmeter was not used because of the configuration of the system's associated piping. Subsequently, we found that the results with the flowmeter yielded inaccurate measurements. The level indicator was checked for accuracy, during Test #1 and #2. Drums of alkaline cleaner were pumped into the MART upper tank and the level indicator was compared to the number of 55-gallon drums that were pumped into the unit. The difference was less than five percent in both cases.

The treated alkaline cleaner (product) was put into drums after being processed by the MART. The product volumes (vol.) were obtained by estimating the volume level in the 55-gallon drums. Waste volumes were obtained by doing a mass balance on the batch system. The extensive sampling events that occurred were also taken into consideration.

Sample Date	Sample Location	Feed Vol. (L)	Permeate Vol. (L)	Waste Vol. (L)	Temp. (°F)	RI (% Brix)	pH	Cond. (µS)
<i>Test #1 – Engine Compressor Wash</i>								
1-25-01	MART Influent	397.0	NA	NA	69.0	NA	8.0	1,314
1-25-01	MART Effluent	NA	NA	NA	69.0	NA	9.0	1,625
1-26-01	FPS Effluent	NA	364.0	12.5	69.0	NA	7.0	2.0
<i>Test #2 – R&R Parts Washer Alkaline Cleaner</i>								
2-1-01	MART Influent	492.0	NA	NA	68.0	NA	8.0	3,480
2-1-01	MART Effluent	NA	471.0	15.0	68.0	NA	9.5	5,960
<i>Test #3 – AGE Parts Washer Alkaline Cleaner</i>								
6-13-01	AGE Influent	469	NA	NA	ND	NA	8.0	NA
6-13-01	AGE Effluent	NA	449.0	14.0	ND	NA	8.0	NA
<i>Test #4 – Engine Shop Parts Washer Alkaline Cleaner</i>								
2-8-01	MART Influent	436.0	NA	NA	71.0	1.4	9.0	NA
2-8-01	MART Effluent	NA	417.0	13.0	71.0	1.2	9.0	NA

NA = Not Applicable ND = No Data

Table 11. Summary of Process Measurements

4.4 Other Data

Other data collected during the course of the verification test are summarized in **Table 12**.

Description	Value
Cost of Cleaner – Parts Washers	\$31.29/gal
Cost of Cleaner – Engine Compressor	\$6.43/gal
Magic Dust	\$7.77/lb
Carbon Filters	\$27.08/filter
Filter Paper	\$132.48/roll
Resin	\$355/ft ³
*Total Magic Dust Used for Tests #1, #2, #3 and #4	31 lbs
Electricity by Cost	\$0.0743/kWh
Waste Disposal	\$4.55/gal
*Total Waste Generated for Tests #1, #2, #3 and #4	43.4 lbs
Labor Cost (loaded rate)	\$35.00/hr
Cost of MART EQ-1 System	\$9,100

* Totals are for 474 gal of alkaline cleaner processed.

Table 12. Other Data Collected During Verification

5.0 EVALUATION OF RESULTS

5.1 Conductivity and Refractive Index Correlation to Cleaner Recovery

The manufacturer of the Daraclean® (DCN) Alkaline Cleaner recommends that conductivity and refractive index measurements be used to obtain the cleaner concentration in DCN 282 and 235, respectively. Consequently, both of these measurements were obtained in the field using hand-held measuring equipment. In addition to these measurements, samples were submitted to the analytical laboratory for total alkalinity (mg/L as CaCO₃). Alkalinity was used, in addition to the field measurements, in order to evaluate the effectiveness of the MART EQ-1 System in recovering the key components of the concentrated cleaner. Since Test #2 showed that the Magic Dust was interfering with the conductivity measurement, for Test #3 a GC/FID analysis was run for the glycol ether in Daraclean® Cleaner 282. Cleaner recovery efficiency during Test #1, Engine Compressor Wash, was not an objective of this verification test, and subsequently recovery of the ED 563 was not evaluated. The 179th AW does not reuse the treated alkaline cleaner from this waste stream and has no future plans to do so. The Engine Compressor Wash was evaluated to verify the MART's effectiveness in removing contaminants before discharge to a POTW. Primary contaminants include oil and cadmium.

Standard solutions of DCN 282 were made at zero percent, five percent, 10 percent, 12 percent, 17.5 percent, and 22.5 percent in water. Conductivity was measured on each standard sample, and the results were used to plot conductivity versus (vs.) DCN 282 cleaner concentration. The graph is presented in **Figure 4**.

DARACLEAN 282 CONCENTRATION

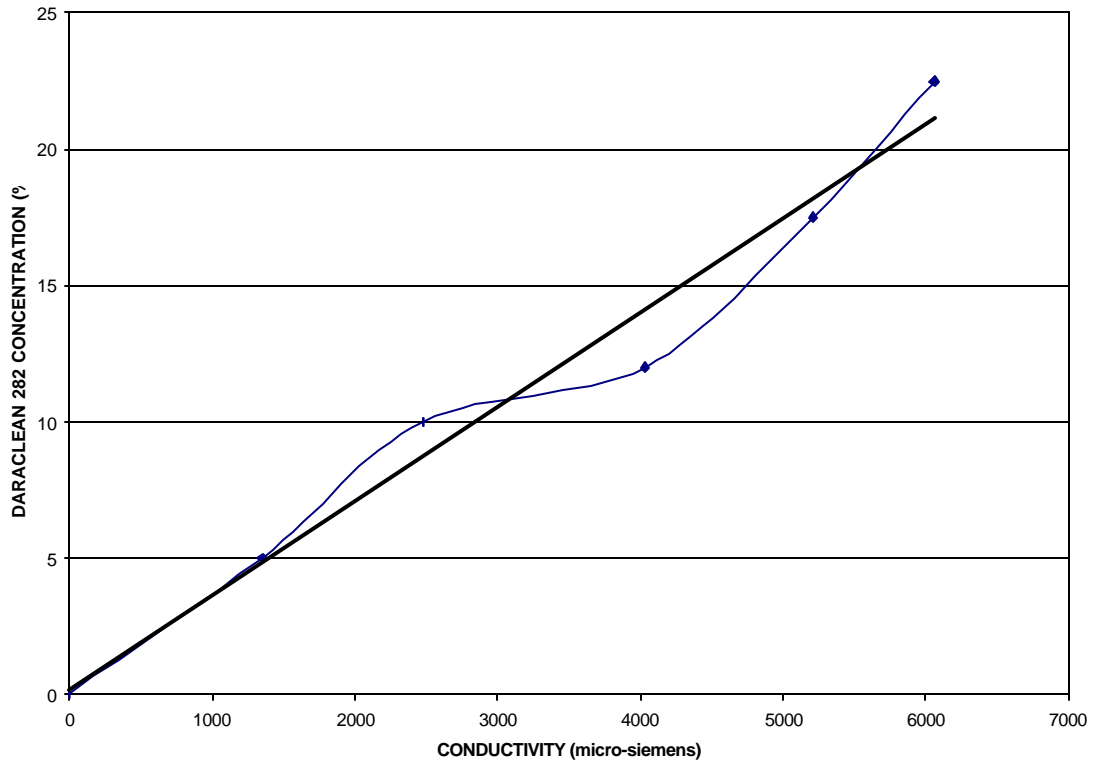


Figure 4. Daraclean[®] 282 Cleaner Concentration vs. Conductivity

A similar graph was created for DCN 235, except standard solutions were made and measured for refractive index instead of conductivity. The graph is presented in **Figure 5**. Standard solutions of DCN 235 were made at zero percent, five percent, seven percent, 10 percent, 12.5 percent, 15 percent, and 20 percent in water.

DADRACLEAN 235 CONCENTRATION

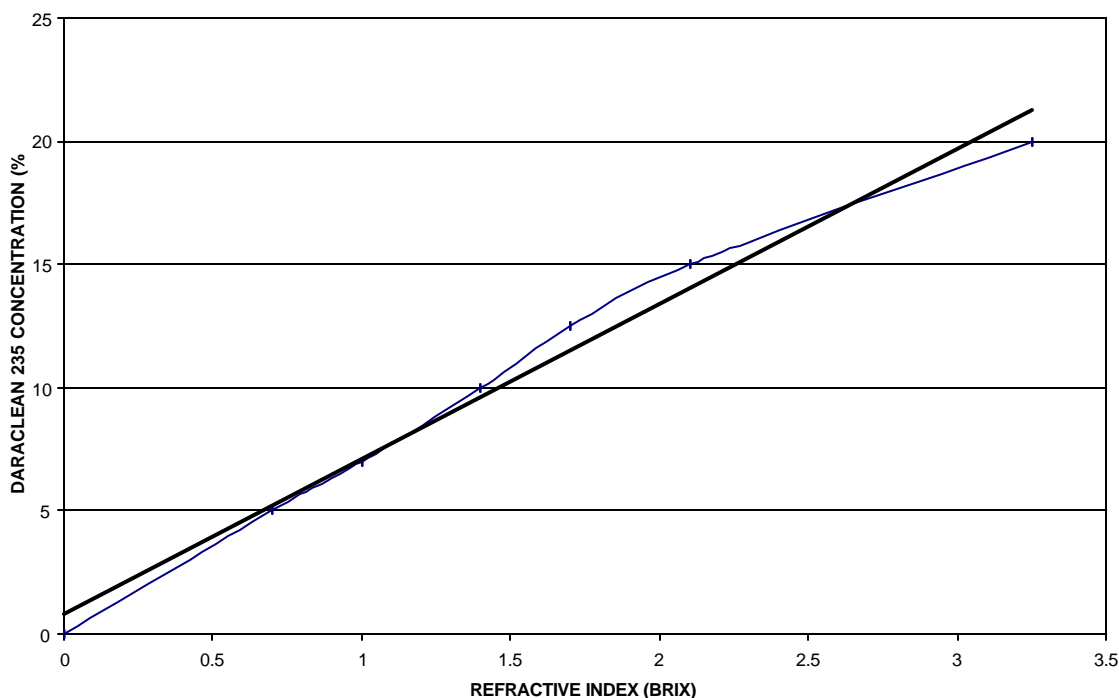


Figure 5. Daraclean 235 Cleaner Concentration vs. Refractive Index

The cleaner concentrations obtained when using these graphs are summarized in **Table 13**. **Figure 4** and the field conductivity measurements performed during Test #2 were used to obtain DCN 282 concentrations in the MART influent and effluent streams. **Figure 5** and the field refractive index measurements performed during Test #4 were used to obtain DCN 235 concentrations in the MART influent and effluent streams.

Sample Date	Sample Location	Conductivity (mS)	DCN 282 Conc. (%)	RI (% BRIX)	DCN 235 Conc. (%)
<i>Test #2 – R&R Parts Washer Alkaline Cleaner</i>					
2-1-01	MART Influent	3,480	12.5	NA	NA
2-1-01	MART Effluent	5,960 ¹	21.3	NA	NA
<i>Test #4 – Engine Shop Parts Washer Alkaline Cleaner</i>					
2-8-01	MART Influent	NA	NA	1.4	8.6
2-8-01	MART Effluent	NA	NA	1.2	7.5

NA – Not Applicable

¹ = Magic Dust interfered with conductivity measurement

Table 13. Cleaner Concentration Values

The DCN 282 concentration increased from the influent to effluent streams. This increase is due to ionic interference associated with the Magic Dust. An increase in ionic interference from the Magic Dust will in turn increase the conductivity. A 0.5 percent

solution (the same percentage used at the 179th AW) of Magic Dust in water was made up to evaluate this interference, but because the Magic Dust is not very soluble in water and it flocculates very quickly, the conductivity obtained (1160 µS) is not believed to be representative. Consequently, the conductivity interference associated with the Magic Dust could not be quantified.

5.2 Recovery Efficiency of Alkaline Cleaner

To understand the recovery efficiency of the alkaline cleaner, recovery efficiencies were calculated for total alkalinity, conductivity, and refractive index. These calculations were performed for Tests #2, #3, and #4. The equation for the cleaner recovery calculation is shown below and the results are presented in **Table 14**.

$$C_{rec} (\%) = [(C_{prod} \times Prod_{vol}) / (C_{feed} \times Feed_{vol})] \times 100\%$$

where:

- C_{rec} = cleaner recovery efficiency
- C_{prod} = product stream cleaner concentration (mg/L)
- $Prod_{vol}$ = product volume collected during cycle (L)
- C_{feed} = feed solution cleaner concentration (mg/L)
- $Feed_{vol}$ = feed solution volume processed during cycle (L)

Example: R&R Parts Washer Alkaline Cleaner – Total Alkalinity % Recovery Efficiency

$$C_{Rec} (\%) = \left[\frac{520 \text{ mg/L} \times 471 \text{ L}}{700 \text{ mg/L} \times 492 \text{ L}} \right] \times 100\% = 71\%$$

Sample Date	Total Alkalinity % Recovered	DCN 235 Cleaner % Recovered	DCN 282 Cleaner % Recovered
<i>Test #2 – R&R Parts Washer Alkaline Cleaner</i>			
2-1-01	71	NA	163 ¹
<i>Test #3 – AGE Parts Washer Alkaline Cleaner</i>			
6-13-01	26	NA	94
<i>Test #4 – Engine Shop Parts Washer Alkaline Cleaner</i>			
2-8-01	96	83	NA

NA – Not Applicable

1 = Magic Dust interfered with conductivity measurement

Table 14. Cleaner Recovery Efficiency

The recovery percentages for alkalinity were above values typically obtained by 179th AW. The Engine Shop recovery was considerably higher (96 percent), indicating that there was little or no change in the alkalinity concentration from influent to effluent.

The DCN 235 percent recovery was also above values typically obtained by 179th AW. In fact, the percent recovery for DCN 282 in Test #2 was well over 100 percent. This is believed to be due to additional ions contributed by the Magic Dust. For Test #3 GC/FID analysis for diethylene glycol monobutyl ether was performed to determine the concentration of DCN 282. The GC/FID analysis is a better method of determining the concentration of the DCN 282. The DCN 235 percent recovery was still high, 94 percent. The lower alkalinity percent recovery is probably due to the fact that Magic Dust was not specifically formulated to treat the AGE parts washer cleaner.

5.3 Contaminant Removal Efficiency

Contaminant removal efficiencies were calculated for the primary contaminants of the alkaline cleaning waste stream: oil, cadmium (Cd), and TSS. The equation for oil removal efficiency is shown below. Cd and TSS removal efficiencies were calculated using a similar equation.

$$O_{\text{eff}} (\%) = 100\% - [(O_{\text{out}} \times \text{Prod}_{\text{vol}}) / (O_{\text{in}} \times \text{Feed}_{\text{vol}})] \times 100\%$$

where:

- O_{eff} = oil removal efficiency
- O_{out} = product stream oil concentration (g/L)
- Prod_{vol} = product volume collected during cycle (L)
- O_{in} = feed solution oil concentration (g/L)
- Feed_{vol} = feed solution volume processed during cycle (L)

The calculated results are shown in **Table 15**.

Test Run and Sample Date	O&G %	TSS %	Ba %	Cd %	Cr %	Cu %	Ni %	Pb %
<i>Test #1 – Engine Compressor Wash</i>								
1-25-01	97	96	97	98	100	96	92	100
<i>Test #2 – R&R Parts Washer Alkaline Cleaner</i>								
2-01-01	69	98	98	14	95	54	13	62
<i>Test #3 – AGE Parts Washer Alkaline Cleaner</i>								
6-13-01	63	83	99	14	100	83	23	54
<i>Test #4 – Engine Shop Parts Washer Alkaline Cleaner</i>								
2-08-01	40	46	94	12	ND	-4	42	12

Table 15. Contaminant Removal Efficiency

As indicated in the data above, during Test #1, the MART EQ-1 System, which included the FPS, removed 97 percent of the oil, 96 percent of the TSS, 97 percent of the barium, 98 percent of the cadmium, 100 percent of the chromium, 96 percent of the copper, 92 percent of the nickel, and 100 percent of the lead from the influent stream. This produced a permeate stream with concentrations of 12 mg/L oil, 20.5 mg/L TSS, 0.005 mg/L

barium, 0.135 mg/L of cadmium, no detection of chromium, 0.017 mg/L copper, 0.64 mg/L nickel, and no detection of lead.

During Test #2, the MART EQ-1 System removed 69 percent of the oil, 98 percent of the TSS, 98 percent of the barium, 14 percent of the cadmium, 95 percent of the chromium, 54 percent of the copper, 13 percent of the nickel, and 62 percent of the lead from the influent stream. This produced a permeate stream with concentrations of 160 mg/L oil, 62 mg/L TSS, 0.0073 mg/L barium, 27 mg/L of cadmium, 0.054 mg/L chromium, 6.3 mg/L copper, 1.0 mg/L nickel, and 2.8 mg/L lead.

During Test #3, the MART EQ-1 System removed 63 percent of the oil, 83 percent of the TSS, 99 percent of the barium, 14 percent of the cadmium, 100 percent of the chromium, 83 percent of the copper, 23 percent of the nickel, and 54 percent of the lead from the influent stream. This produced a permeate stream with concentrations of 150 mg/L oil, 150 mg/L TSS, 0.0098 mg/L barium, 0.36 mg/L of cadmium, no detection of chromium, 0.26 mg/L copper, 0.8 mg/L nickel, and 1.1 mg/L lead.

During Test #4, the MART EQ-1 System removed 40 percent of the oil, 46 percent of the TSS, 94 percent of the barium, 12 percent of the cadmium, - 4 percent of the copper, 42 percent of the nickel, and 12 percent of the lead from the influent stream. Chromium was not detected. This produced a permeate stream with concentrations of 1000 mg/L oil, 140 mg/L TSS, 0.012 mg/L barium, 11 mg/L of cadmium, no detection of chromium, 1.2 mg/L copper, 1.1 mg/L nickel, and 0.11 mg/L lead. Low copper concentration and typical analytical variability are the reasons for a negative copper removal efficiency.

The differences in data, between the tests, are attributed to Test #1 utilizing the MART FPS, whereas the other tests did not. However, the contaminant removal efficiencies for Test #1, before the FPS, were relatively high as well (see data in **Table 7**). This can be attributed to the fact that the Magic Dust used was formulated to remove the contaminant levels so that this waste stream would meet the 179th AW local POTW effluent limits.

The same Magic Dust formulation used to treat the engine compressor wash (Test #1) is also used to treat the parts washers evaluated in Tests #2 and #4, because they have similar contaminants. The Magic Dust formulation for the AGE parts washer is formulated differently than for Tests #1, #2 and #4 due to the nature of the waste stream. MART's recommended treatment criteria for the 179th AW's parts washers' streams include only visual clarity, not contaminant removal. The Magic Dust formulations used achieve satisfactory visual clarity. However, there was no research done to understand how the differences in cleaners used for these waste streams would impact the MART EQ-1 System contaminant removal efficiency.

This was justified because complete contaminant removal is not required to recycle alkaline cleaners. With Tests #2, #3, and #4 yielding satisfactory removal efficiencies for O&G, and TSS, and a low-contaminant removal efficiency for cadmium, the alkaline cleaner was considered effectively recycled.

5.4 Energy Use

The electrical service required for the MART EQ-1 System at the 179th AW is 115 VAC and 17 amps. Electricity is also used for several very small feed pumps and a mixer; however, the energy requirements for these devices are insignificant and were not evaluated during this project.

Energy usage was calculated by converting the system electrical service requirements (17 amps, 115 volts) into kilowatts and multiplying by the number of hours operated.

$$17 \text{ amps} \times 115 \text{ Volts} = 1955 \text{ watts (1.955 kW)}$$

The MART EQ-1 System operated for a total of 26.33 hours during the first run which included pumping the effluent through FPS system. The MART EQ-1 System ran for 4.73 hours during each of the three parts washer tests for a total of 14.19 hours. The estimated energy used during all four tests was:

$$1.955 \text{ kW} \times 40.52 \text{ hours} = 79.2 \text{ kWh}$$

5.5 Operating and Maintenance Labor Analysis

O&M labor requirements for the recycling system were observed during testing. The system requires 3.0 hours of labor to operate for each batch, which includes set-up, pumping the waste stream into the upper reservoir, adding the Magic Dust until flocculation occurs, emptying the permeate solution, and wrapping up the encapsulated waste into the filter paper. These tasks require that the system operator not leave the unit unattended. In 2000, the 179th AW had to re-treat a waste stream because it did not meet the effluent limits for cadmium. This task took an additional three hours.

Maintenance requirements for the recycling system are minimal at the 179th AW. Periodic maintenance includes changing the resin in the FPS and cleaning the system for winter storage. These activities amount to approximately four hours per year.

The 179th AW had to replace the FPS pump in the fall of 2000. Maintenance hours associated with this activity amounted to eight hours.

5.6 Chemical Use Analysis

5.6.1 Concentrated Cleaner

Prior to the purchase and utilization of the MART aqueous recycling system, the 179th AW was utilizing a solvent cleaning process. The recycling system and the 179th AW's aqueous parts washers were purchased at the same time. The recycling system was obtained to treat the C-130H engine compressor wash that was, at that time, being shipped off-site for disposal. The aqueous parts washers were obtained to replace the solvent cleaning process. The recycling system

provided the 179th AW the added bonus of treating the parts washers' alkaline cleaner and recovering the alkaline cleaner for reuse. Since the MART recycling system was instituted with the parts washers already on line, there is no available background data to determine the savings associated solely with the use of the aqueous recycling system at the 179th AW. However, prior to switching from solvent cleaning to aqueous cleaning, the 179th disposed of the spent solvent cleaning waste stream through off-site disposal. Prior to the MART recycling system, the waste stream from the aqueous parts washers was shipped off-site for disposal as hazardous waste.

Prior to utilization of the MART recycling system, concentrated cleaner was replaced in the parts washers once each year. The approximate annual volume of concentrated cleaner that was used to make up fresh solutions for the parts washers was 57 gallons (34 gallons of DCN 282; 23 gallons of DCN 235). In addition, one gallon of concentrated cleaner was added monthly to each of the three parts washers (1 gallon X 3 parts washers X 12 months = 36 gallons). The total annual volume of concentrated cleaner used prior to utilization of the MART EQ-1 System was 93 gallons (57 + 36 = 93).

With the MART EQ-1 recycling system operational, approximately four gallons of concentrated cleaner is added to the treated alkaline cleaner, in each of the three parts washers, in order to get the cleaner concentration back up to a concentration of 12–14 percent (4 gallons X 3 parts washers = 12 gallons). The cleaner concentration is then checked, on a monthly basis. Normally, one gallon of concentrated cleaner is added monthly to each of the parts washers (1 gallon X 3 parts washers X 12 months = 36 gallons). The total annual volume of concentrated cleaner used after installation of the MART EQ-1 System is 48 gallons (12 + 36 = 48).

The standard operating procedure at the 179th AW is to dispose of the engine compressor wash. This waste stream is not recycled. Approximately one to two gallons of concentrated cleaner is used for each aircraft. The annual volume of cleaner (ED563) that was used to clean the C-130H engine compressors in 2000 was five gallons.

5.6.2 Magic Dust

The quantity of Magic Dust required to process 100 gallons of alkaline cleaner is about six to eight lbs. for typical contaminant loading. This quantity will vary as the contaminant load in the alkaline cleaner increases or decreases. The quantity of Magic Dust was observed during the verification and is summarized below per 100 gallons of alkaline cleaner:

- Test #1, Engine Compressor Wash (Formulation 29498-73105) – six lbs.
- Test #2, R&R Parts Washer alkaline cleaner (Formulation 29498-73105) – eleven lbs.

- Test #3, AGE Parts Washer (Formulation 73104-01004) – eight lbs.
- Test #4, Engine Shop Parts Washer alkaline cleaner (Formulation 29498-73105) – six lbs.

5.6.3 FPS Supplies

The FPS contains a carbon filter and resin chamber. The carbon filters are changed at the rate of one for every 100–125 gallons of water processed. The resin chamber contains $\frac{1}{2}$ ft³ of resin, and it is changed out once annually.

5.7 Waste Generation Analysis

Prior to the utilization of the MART recycling system, the engine compressor wash was shipped off-site for disposal. The waste had to be shipped as hazardous material primarily due to its heavy metals concentration, specifically cadmium. The labor associated with disposing of the engine compressor wash was 10 hours for the eight C-130H aircraft engines that were cleaned. The labor includes transferring the wash from a collection container into drums for off-site disposal. The cost of off-site disposal for the engine compressor wash, before utilization of the MART system, was \$400 to \$650 annually (300 gallons @ \$400 in 1997; 200 gallons @ \$640 in 1998²).

The parts washers' waste streams generated 450 gallons of hazardous waste annually. The labor associated with preparing this material for off-site disposal was 12 hours.

With the utilization of the recycling system, the treated engine compressor wash is non-hazardous for cadmium and most often meets the 179th AW's local POTW effluent limits. Wastewater that does not meet effluent limits is re-treated until it does. The parts washers' treated alkaline cleaner is pumped back into the washers' reservoir and reused after concentrated cleaner is added. The encapsulated waste generated as a result of the recycling system, however, is considered hazardous and is disposed of as such. Approximately one 50-gallon drum of hazardous waste is generated annually after treating 750 gallons of wastewater at the 179th AW. The hazardous waste is comprised primarily of encapsulated waste, but it does also contain spent carbon filters and resin.

The sludge wastes generated during each of the tests are summarized below:

- Test #1 – 5,144 g of dry sludge (2,722 g Magic Dust)
- Test #2 – 7,056 g of dry sludge (4,990 g Magic Dust)
- Test #3 – 5,700 g of dry sludge (3,655 g Magic Dust)
- Test #4 – 3,714 g of dry sludge (2,722 g Magic Dust)

The weights above include the Magic Dust, encapsulated waste, and filter paper. The weight of the filter paper, however, is negligible.

² The following is historical data provided by the 179th AW. In 1997, the hazardous waste drums were shipped using a government transporter, which provided a good shipping price. In 1998, the drums were shipped via a private company. This is the reason for the drastic difference in cost between the two years.

5.8 Cost Analysis

The capital cost of the MART EQ-1 System in 1998 was \$9,100 (includes \$6,100 for the basic EQ-1 unit, \$2,800 for the optional FPS, and \$200 for feed pump and associated industrial hoses). There were no installation or start-up costs because the system is self-contained and comes ready for use.

Annual costs and savings associated with the MART EQ-1 System are shown in **Table 16**. The annual operating costs of the MART EQ-1 System are \$3,588. The annual operating costs prior to installation of the MART EQ-1 System were \$6,897, resulting in a net annual savings of \$3,309. The simple payback period is 2.8 years (capital cost/net annual savings).

Item	Prior to Installation of the MART EQ-1™ System			After Installation of MART EQ-1™ System		
	Units	Unit Cost \$/unit	Cost \$	Units	Unit Cost \$/unit	Cost \$
Electricity for recovery unit (see section 5.4)	0	0	0	79.2 kWh	.0743	5.88
Recycling unit O&M labor (see section 5.5)	0	0	0	36 hr	35	1,260
Cleaner Use – Parts Washers (see section 5.6)	93 gal	31.29	2,910	48 gal	31.29	1,502
Cleaner Use – Engine Compressor (see section 5.6)	5	6.43	32.15	5	6.43	32.15
FPS Supplies – Resin (see section 5.6.3)	0	0	0	½ ft ³	\$355	\$177.50
FPS Supplies – Carbon Filters (see section 5.6.3)	0	0	0	4 filters	\$27.08	\$108.32
Magic Dust Use – (see section 5.6.2)	0	0	0	31 lbs	\$7.77	\$240.87
Filter Paper Use	0	0	0	¼ roll	\$132.48	\$33.12
Waste Generation (associated labor; see section 5.7)	22 hrs	35	770	*	*	*
Waste Generation (disposal costs; see section 5.7)	700 gal	4.55	3,185	50 gal	4.55	228
Total Costs			6,897			3,588

* Waste generation cost after installation is included in the Recycling Unit O&M Labor, because it is a part of the recycling system process.

Table 16. Annual Costs/Savings

5.9 Project Responsibilities/Audits

Verification testing activities and sample analysis were performed according to section 4.0 of the Verification Test Plan [Ref. 1].

There was one audit conducted during the verification test of this technology. The audit was an internal *CTC* Technical Systems Audit (TSA), conducted by Mr. Clinton Twilley, *CTC* QA Manager, on February 25, 2001. Mr. Twilley identified no findings and five observations (opportunities for improvement). Actions for implementing these opportunities for improvement are being incorporated into future test projects.

6.0 REFERENCES

All references are available by accessing the EPA ETV or ETV-MF Program Internet websites at: www.epa.gov/etv or www.etv-mf.org, respectively.

1. Concurrent Technologies Corporation, “*Environmental Technology Verification Program for Metal Finishing Pollution Prevention Technologies Verification Test Plan, Evaluation of MART Corporation’s EQ-1 Wastewater Processing System,*” January 5, 2001.
2. Concurrent Technologies Corporation, “*Environmental Technology Verification Program Metal Finishing Technologies Quality Management Plan,*” Revision 1, March 26, 2001.

APPENDIX A

PROCESS MEASUREMENTS

Engine Compressor Washwater

Revision 0 - 1/5/01

Figure 4. Data Collection Form

Test #: 1 Date: 1/25/01 Batch #: 1
 Revision #: 0 Revision Date: Original

Operation: MART EQ-1™ System
 Technology Type: Water Recycling

Date/Time	Initials	Sample Number	Sample Location	MART EQ-1™ Influent Stream	MART EQ-1™ Effluent /FPS Influent Stream	MART FPS Effluent Stream	Settling Time (minutes)	Flocculation Time (minutes)	Notes and Observations
				Conductivity/Refractive Index (% Bx)	Conductivity/Refractive Index (% Bx)	Conductivity/Refractive Index (% Bx)			
1-25 1656	KD	Field	MART Influent	1314 μ S @ 20.8°C N/A			INSTANT	INSTANT	PH - 8.0; Conductivity measurement checked 3 times on each sample & verified same results
1-25 1430	KD	Field	MART Effluent		1625 μ S @ 20.8°C N/A				PH - 9.0; "
1-26 1030	KD	Field	FPS Effluent			2450 μ S @ 20.8°C N/A			PH - 7.0; "
1-25	KD	CAL	1413 μ S Soln.	1199 μ S @ 42°F (5.6°C)					

Total Wastewater Flow into MART EQ-1™ (L) 924 (ultrasonic flowmeter) / 397 L (EQ-1 upper tank level); # of drums pumped into EQ-1 upper tank = 2 (55 gal. each)
 Total Wastewater Flow out of MART™ FPS (L) not possible (flow too small to get accurate reading when using the ultrasonic flowmeter) ~ 1 3/4 drum (55 gal. each)

Page 1 of 1

CAL - Calibration
 N/A - not applicable

R & B Parts Washer Wastewater

Revision 0 - 1/5/01

Figure 4. Data Collection Form

Test #: 2 Date: 1/31/01 Batch #: 1
 Revision #: 0 Revision Date: Original

Operation: MART EQ-1™ System
 Technology Type: Water Recycling

Date/Time	Initials	Sample Number	Sample Location	MART EQ-1™ Influent Stream	MART EQ-1™ Effluent /FPS Influent Stream	MART FPS Effluent Stream	Settling Time (minutes)	Flocculation Time (minutes)	Notes and Observations
				Conductivity/Refractive Index (% Bx)	Conductivity/Refractive Index (% Bx)	Conductivity/Refractive Index (% Bx)			
2-1/1120	KQ	CAL	447 μS Cal. soln.	402 μS @ 20°C N/A					
2-1/1120	KQ	CAL	1413 μS Cal. soln.	1278 μS @ 20°C N/A					
2-1/1130	KQ	CAL	Daraclean 282 Nest	17.97 mS @ 20°C N/A					Recheck 2-6-01, 1100 17.92 mS @ 20.4 °C
2-1/1131	KQ	CAL	57.282	1333 μS @ 20°C N/A					Recheck 2-6-01, 1100 15.95 mS @ 20.4 °C
2-1/1133	KQ	CAL	107.282	2.5 mS @ 20°C N/A					Recheck 2-6-01, 1100 2.57 mS @ 20.2 °C
2-1/1135	KQ	CAL	151.282	3.9 mS @ 20°C N/A					Recheck 2-6-01, 1100 4.14 mS @ 20.3 °C
2-1/1140	KQ	FIELD	MART INFLUENT	3.48 mS @ 20°C N/A		N/A	INSTANT	INSTANT	pH - 8.0; conductivity measurements checked 3 times on same sample; yielded same result
2-1/1145	KQ	FIELD	MART EFFLUENT		5.96 mS @ 20°C N/A	N/A			pH - 9.5; " " " "
2-6/1045	KQ	CAL	20% 282	6.13 mS @ 20.2°C N/A					
2-6/1055	KQ	CAL	18% 282	4.6 mS @ 20.4°C N/A					

Total Wastewater Flow into MART EQ-1™ (L) $\frac{502}{492}$ (EQ-1 upper tank level); # of drums dumped into EQ-1 upper tank = ~2 1/2 (55 gal. each)

Total Wastewater Flow out of MART™ FPS (L) $\frac{N/A}{N/A}$ ~ 2 1/4 drums (55 gal. each)

CAL - calibration
 N/A - not applicable

Engine Shop Wastewater

Revision 0 - 1/5/01

Figure 4. Data Collection Form

Test #: 4 Date: 2-8-01 Batch #: 1
 Revision #: 0 Revision Date: Original

Operation: MART EQ-1™ System
 Technology Type: Water Recycling

Date/Time	Initials	Sample Number	Sample Location	MART EQ-1™ Influent Stream	MART EQ-1™ Effluent /FPS Influent Stream	MART FPS Effluent Stream	Settling Time (minutes)	Flocculation Time (minutes)	Notes and Observations
				Conductivity/Refractive Index (% Bx)	Conductivity/Refractive Index (% Bx)	Conductivity/Refractive Index (% Bx)			
2-8/1345	KQ	FIELD	MART INFLUENT	N/A / 1.4 @ 21.6°C (2.9-0.1, 1250)		N/A	INSTANT	INSTANT	pH - 9.0. Conductivity measurement checked 3 times on same sample; yielded same result.
2-8/1405	KQ	FIELD	MART EFFLUENT		N/A / 1.2 @ 21.5°C (2.9-0.1, 1300)	N/A			pH - 9.0; " " "
2-9/1150	KQ	CAL	DI H2O	N/A / 0.0 @ 20°C					
2-9/1200	KQ	CAL	20% DARAUCAN 235	N/A / 3.25 @ 27°C					
2-9/1210	KQ	CAL	100% DCN 235	N/A / Dr. ready (23°C)					
2-9/1215	KQ	CAL	13% DCN 235	N/A / 2.0 @ 28°C					
2-9/1227	KQ	CHECK	5% DCN 235	N/A / 0.7 @ 26.6°C					
2-9/1237	KQ	CHECK	10% DCN 235	N/A / 1.5 @ 24.7°C					
2-9/1246	KQ	CHECK	15% DCN 235	N/A / 2.2 @ 23.1°C					

Total Wastewater Flow into MART EQ-1™ (L) 436 (using level on MART EQ-1 upper tank)

Total Wastewater Flow out of MART™ FPS (L) N/A (2 drums - 55 gal. each)

CAL - calibration
 N/A - not applicable

APPENDIX B

PRECISION CALCULATIONS

PRECISION CALCULATIONS

Laboratory ID	CTC ID	Parameter	Units	Sample Value	Duplicate Value	RPD %	RPD % Limits	RPD Met Y/N
01-A001411	EC01	Alkalinity	mg/L	280	300	8.9	<10	Y
01-A001412	EC02	Alkalinity	mg/L	300	310	3.3	<10	Y
01-A001421	EC16	Alkalinity	mg/L	260	240	8.0	<10	Y
01-A001422	EC18	TSS	mg/L	53.0	52.0	1.9	<19	Y
01-A001424	EC21	Total Metals – Ba	mg/L	0.0034	0.0034	0.0	<20	Y
01-A001424	EC21	Total Metals – Cd	mg/L	0.360	0.360	0.0	<20	Y
01-A001424	EC21	Total Metals – Cr	mg/L	<0.001	<0.001	0.0	<15	Y
01-A001424	EC21	Total Metals – Cu	mg/L	0.035	0.036	2.8	<20	Y
01-A001424	EC21	Total Metals – Ni	mg/L	0.940	0.940	0.0	<18	Y
01-A001424	EC21	Total Metals – Pb	mg/L	<0.01	<0.01	0.0	<20	Y
01-A001484	EC25	Total O&G	mg/L	28.0	33.0	16.3	<22	Y
01-A001482	EC28	Total O&G	mg/L	39.0	34.0	13.7	<22	Y
01-A001776	EC29	Total O&G	µg/g	120,000.0	110,000.0	8.7	<22	Y
01-A001793	EC42	Total O&G	mg/L	13	13	0.0	<22	Y
01-A002110	ESM03	Total O&G	mg/L	8600.0	9400.0	8.9	<22	Y
01-A001775	ECM04	Total Metals – Ba	mg/L	0.0506	0.0570	2.8	<20	Y
01-A001775	ECM04	Total Metals – Cd	mg/L	<0.0005	<0.0005	0.0	<20	Y
01-A001775	ECM04	Total Metals – Cu	mg/L	0.175	0.173	1.1	<20	Y
01-A001775	ECM04	Total Metals – Ni	mg/L	<0.005	<0.005	0.0	<18	Y
01-A001775	ECM04	Total Metals – Pb	mg/L	<0.01	<0.01	0.0	<20	Y
01-A002110	ESM03	Total O&G	mg/L	8600	9400	8.9	<22	Y
01-A002352	ES05	Total O&G	mg/L	1600.0	1700.0	6.1	<22	Y
01-A002361	ES08	Total Metals – Ba	mg/L	0.017	0.016	9.7	<20	Y
01-A002361	ES08	Total Metals – Cd	mg/L	11.7	11.7	0.0	<20	Y
01-A002361	ES08	Total Metals – Cr	mg/L	<0.001	<0.001	0.0	<25	Y
01-A002361	ES08	Total Metals – Cu	mg/L	1.13	1.13	2.7	<20	Y
01-A002361	ES08	Total Metals – Ni	mg/L	1.11	1.10	0.9	<18	Y
01-A002361	ES08	Total Metals – Pb	mg/L	0.13	0.12	8.0	<20	Y
01-A002364	ES18	TCLP Metals – As	mg/L	<0.03	<0.03	0.0	<25	Y
01-A002364	ES18	TCLP Metals – Ba	mg/L	<1.0	<1.0	0.0	<21	Y
01-A002364	ES18	TCLP Metals – Cd	mg/L	0.99	0.96	3.1	<20	Y
01-A002364	ES18	TCLP Metals – Cr	mg/L	<0.1	<0.1	0.0	<25	Y
01-A002364	ES18	TCLP Metals – Pb	mg/L	<0.1	<0.1	0.0	<25	Y
01-A002364	ES18	TCLP Metals – Hg	mg/L	<0.01	<0.01	0.0	<20	Y
01-A002364	ES18	TCLP Metals – Se	mg/L	<0.05	<0.05	0.0	<20	Y
01-A002364	ES18	TCLP Metals – Ag	mg/L	<0.05	<0.05	0.0	<20	Y
01-A002364	ES18	TCLP Metals – Cu	mg/L	0.18	0.16	12.0	<25	Y
01-A002364	ES18	TCLP Metals – Ni	mg/L	0.09	0.09	0.0	<25	Y
01-A002364	ES18	TCLP Metals – Zn	mg/L	0.30	0.30	0.0	<22	Y
01-A009212	AGE 21	Glycol Ether	mg/L	660	630	3.1	<10	Y
01-A009194	AGE 16	Total Metals – Ba	mg/L	0.0086	0.0086	3.4	<20	Y
01-A009194	AGE 16	Total Metals – Cd	mg/L	0.354	0.349	1.4	<20	Y
01-A009194	AGE 16	Total Metals – Cr	mg/L	<0.001	<0.001	0.0	<25	Y
01-A009194	AGE 16	Total Metals – Cu	mg/L	0.258	0.258	0.0	<20	Y
01-A009194	AGE 16	Total Metals – Ni	mg/L	0.772	0.770	0.0	<18	Y
01-A009194	AGE 16	Total Metals – Pb	mg/L	1.12	1.11	0.9	<20	Y
01-A009203	AGE 11	O&G Solid	ug/g	9000	8600	4.5	<22	Y
01-A009200	AGE 12	Total Metals – Ba	ug/g	100	102	2.0	<20	Y
01-A009200	AGE 12	Total Metals – Cd	ug/g	3.60	3.60	0.0	<20	Y
01-A009200	AGE 12	Total Metals – Cr	ug/g	28.7	28.7	0.4	<25	Y
01-A009200	AGE 12	Total Metals – Cu	ug/g	45.1	47.7	5.6	<20	Y
01-A009200	AGE 12	Total Metals – Ni	ug/g	18.9	19.0	0.5	<18	Y
01-A009200	AGE 12	Total Metals – Pb	ug/g	45.5	45.3	0.4	<20	Y
01-A009201	AGE 14	TCLP Metals – As	mg/L	<0.03	<0.03	0.0	<25	Y
01-A009201	AGE 14	TCLP Metals – Ba	mg/L	<1.0	<1.0	0.0	<21	Y
01-A009201	AGE 14	TCLP Metals – Cd	mg/L	0.11	0.11	0.0	<20	Y
01-A009201	AGE 14	TCLP Metals – Cr	mg/L	<0.1	<0.1	0.0	<25	Y

Laboratory ID	CTC ID	Parameter	Units	Sample Value	Duplicate Value	RPD %	RPD % Limits	RPD Met Y/N
01-A009201	AGE 14	TCLP Metals – Pb	mg/L	<0.1	<0.1	0.0	<25	Y
01-A009201	AGE 14	TCLP Metals – Hg	mg/L	<0.01	<0.01	0.0	<20	Y
01-A009201	AGE 14	TCLP Metals – Se	mg/L	<0.05	<0.05	0.0	<20	Y
01-A009201	AGE 14	TCLP Metals – Ag	mg/L	<0.05	<0.05	0.0	<20	Y
01-A009201	AGE 14	TCLP Metals – Cu	mg/L	0.10	0.01	0.0	<25	Y
01-A009201	AGE 14	TCLP Metals – Ni	mg/L	0.07	0.08	13.0	<25	Y
01-A009201	AGE 14	TCLP Metals – Zn	mg/L	40.0	32.0	32	<22	N

APPENDIX C

ACCURACY CALCULATIONS

ACCURACY CALCULATIONS

CTC ID	Parameter	Units	Sample Value	Sample +Spike Value	Spike Value	Recovery %	Target % Recovery	Accuracy Met? Y/N
EC21	Total Metals – Ba	mg/L	0.0034	0.910	0.900	101	85-115	Y
EC21	Total Metals – Cd	mg/L	0.360	1.34	0.900	109	85-115	Y
EC21	Total Metals – Cr	mg/L	<0.001	0.850	0.900	94.4	80-120	Y
EC21	Total Metals – Cu	mg/L	0.035	1.08	1.00	104	80-120	Y
EC21	Total Metals – Ni	mg/L	0.940	1.73	0.900	87.8	80-120	Y
EC21	Total Metals – Pb	mg/L	<0.01	0.17	0.18	94.4	85-115	Y
ES16	Total Metals – Ba	mg/L	0.0035	0.910	1.00	87.5	85-115	Y
ES16	Total Metals – Cr	mg/L	<0.001	0.900	1.00	90.0	80-120	Y
ES16	Total Metals – Cu	mg/L	1.04	1.99	1.00	95	80-120	Y
ES16	Total Metals – Ni	mg/L	1.08	1.90	1.00	82.0	80-120	Y
ES16	Total Metals – Pb	mg/L	0.12	0.30	0.20	90.0	85-115	Y
ES17	TCLP – As	mg/L	<0.03	0.19	0.20	95.0	80-120	Y
ES17	TCLP – Ba	mg/L	<1.0	1.0	1.0	100.0	80-120	Y
ES17	TCLP – Cd	mg/L	1.1	2.0	1.0	90.0	80-120	Y
ES17	TCLP – Cr	mg/L	<0.01	0.90	1.0	90.0	75-125	Y
ES17	TCLP – Pb	mg/L	<0.1	0.20	0.20	100.0	75-125	Y
ES17	TCLP – Hg	mg/L	<0.01	0.20	0.20	100.0	80-120	Y
ES17	TCLP – Se	mg/L	<0.05	0.21	0.20	105.0	75-125	Y
ES17	TCLP – Ag	mg/L	<0.05	0.20	0.20	100.0	80-120	Y
ES17	TCLP – Cu	mg/L	0.21	1.2	1.0	99.0	75-125	Y
ES17	TCLP – Ni	mg/L	0.10	0.98	1.0	88.0	82-118	Y
ES17	TCLP – Zn	mg/L	0.33	1.20	1.0	87.0	82-118	Y
AGE 07	O&G Water	mg/L	410	500	100	90.0	75-125	Y
AGE 19	O&G Water	mg/L	130	210	100	80.0	75-125	Y
AGE 11	O&G Solid	ug/L	9000	9400	500	80	75-125	Y
AGE 11	O&G Solid	ug/L	9000	9400	500	80	75-125	Y
AGE 17	Total Metals – Ba	mg/L	0.00	1.14	1.00	113	85-115	Y
AGE 17	Total Metals – Ba	mg/L	0.00	1.20	1.00	119	85-115	N
AGE 17	Total Metals – Cd	mg/L	0.351	0.537	0.200	93.0	85-115	Y
AGE 17	Total Metals – Cd	mg/L	0.351	0.530	0.200	89.5	85-115	Y
AGE 17	Total Metals – Cr	mg/L	<0.001	1.15	1.00	115	80-120	Y
AGE 17	Total Metals – Cr	mg/L	<0.001	1.10	1.00	110	80-120	Y
AGE 17	Total Metals – Cu	mg/L	0.264	1.39	1.00	113	80-120	Y
AGE 17	Total Metals – Cu	mg/L	0.264	1.41	1.00	115	80-120	Y
AGE 17	Total Metals – Ni	mg/L	0.779	1.84	1.00	106	80-120	Y
AGE 17	Total Metals – Ni	mg/L	0.779	1.90	1.00	112	80-120	Y
AGE 17	Total Metals – Pb	mg/L	1.10	1.30	0.20	100	85-115	Y
AGE 17	Total Metals – Pb	mg/L	1.10	1.34	0.20	120	85-115	N
AGE 12	Total Metals Solid – Ba	ug/L	102	350	250	99.2	80-120	Y
AGE 12	Total Metals Solid – Ba	ug/L	102	384	300	94.0	80-120	Y
AGE 12	Total Metals Solid – Cd	ug/L	3.60	54.0	50.0	101.	80-120	Y
AGE 12	Total Metals Solid – Cd	ug/L	3.60	55.0	60.0	85.7	80-120	Y
AGE 12	Total Metals Solid – Cr	ug/L	28.7	72.0	50.0	86.6	80-120	Y
AGE 12	Total Metals Solid – Cr	ug/L	28.7	81.0	60.0	87.2	80-120	Y
AGE 12	Total Metals Solid – Cu	ug/L	45.1	293.	250	99.2	75-125	Y
AGE 12	Total Metals Solid – Cu	ug/L	45.1	289.	300	81.3	75-125	Y
AGE 12	Total Metals Solid – Ni	ug/L	18.9	345.	250	130.	82-118	N
AGE 12	Total Metals Solid – Ni	ug/L	18.9	350.	300	110.	82-118	Y
AGE 12	Total Metals Solid – Pb	ug/L	45.5	97.0	50.0	103.	80-120	Y
AGE 12	Total Metals Solid – Pb	ug/L	45.5	95.0	60.0	82.5	80-120	Y
AGE 14	TCLP – As	mg/L	<0.03	0.23	0.20	115.	80-120	Y
AGE 14	TCLP – As	mg/L	<0.03	0.26	0.25	104.	80-120	Y
AGE 14	TCLP – Ba	mg/L	<1.0	1.2	1.0	120	80-120	Y
AGE 14	TCLP – Ba	mg/L	<1.0	1.6	1.5	107	80-120	Y
AGE 14	TCLP – Cd	mg/L	0.12	0.32	0.20	100	80-120	Y
AGE 14	TCLP – Cd	mg/L	0.12	0.35	0.25	92.0	80-120	Y
AGE 14	TCLP – Cr	mg/L	<0.01	1.2	1.5	120	75-125	Y

CTC ID	Parameter	Units	Sample Value	Sample +Spike Value	Spike Value	Recovery %	Target % Recovery	Accuracy Met? Y/N
AGE 14	TCLP- Cr	mg/L	<0.01	1.4	1.5	93.3	75-125	Y
AGE 14	TCLP- Pb	mg/L	<0.1	0.20	0.20	100.	75-125	Y
AGE 14	TCLP- Pb	mg/L	<0.1	0.22	0.25	88.0	75-125	Y
AGE 14	TCLP- Hg	mg/L	0.01	0.48	0.50	94.0	80-120	Y
AGE 14	TCLP- Hg	mg/L	0.01	0.47	0.50	92.0	80-120	Y
AGE 14	TCLP- Se	mg/L	<0.05	0.24	0.20	120.	75-125	Y
AGE 14	TCLP- Se	mg/L	<0.05	0.29	0.25	116.	75-125	Y
AGE 14	TCLP- Ag	mg/L	<0.05	0.58	0.50	116.	80-120	Y
AGE 14	TCLP- Ag	mg/L	<0.05	0.47	0.50	94.0	80-120	Y
AGE 14	TCLP- Cu	mg/L	0.10	1.2	1.0	110.	75-125	Y
AGE 14	TCLP- Cu	mg/L	0.10	1.5	1.5	93.3	75-125	Y
AGE 14	TCLP- Ni	mg/L	0.07	1.2	1.0	113	82-118	Y
AGE 14	TCLP- Ni	mg/L	0.07	1.3	1.5	82.0	82-118	Y
AGE 14	TCLP - Zn	mg/L	1.2	2.2	1.0	100	82-118	Y
AGE 14	TCLP - Zn	mg/L	1.2	2.5	1.5	86.7	82-118	Y

APPENDIX D

REPRESENTATIVENESS CALCULATIONS

REPRESENTATIVENESS CALCULATIONS

<i>CTC ID</i>	Parameter	Units	Sample Value	Duplicate <i>CTC ID</i>	Duplicate Value	% Difference	RPD % Limits	RPD Met Y/N
Engine Cleaner								
EC 01	Alkalinity	mg/L	280	EC 02	300	6.7	10	Y
EC 04	TSS	mg/L	370	EC 05	370	0.0	20	Y
EC 07	Barium	mg/L	0.17	EC 09	0.17	0.0	20	Y
EC 07	Cadmium	mg/L	6.5	EC 09	6.5	0.0	20	Y
EC 07	Chromium	mg/L	0.2	EC 09	0.2	0.0	15	Y
EC 07	Copper	mg/L	0.35	EC 09	0.35	0.0	20	Y
EC 07	Nickel	mg/L	7.5	EC 09	7.5	0.0	18	Y
EC 07	Lead	mg/L	0.08	EC 09	0.08	0.0	20	Y
EC 10-11	Liq. O&G	mg/L	370	EC 12-13	695	69.5	22	N
EC 15	Alkalinity	mg/L	260	EC 16	260	0.0	10	Y
EC 18	TSS	mg/L	53	EC 19	54	1.9	20	Y
EC 21	Barium	mg/L	0.0034	EC 22	0.0039	13.7	20	Y
EC 21	Cadmium	mg/L	0.36	EC 22	0.36	0.0	20	Y
EC 21	Chromium	mg/L	<0.001	EC 22	<0.001	0.0	15	Y
EC 21	Copper	mg/L	0.035	EC 22	0.035	0.0	20	Y
EC 21	Nickel	mg/L	0.94	EC 22	0.93	1.1	18	Y
EC 21	Lead	mg/L	<0.01	EC 22	<0.01	0.0	20	Y
EC 25-26	Liq. O&G	mg/L	26	EC 27-28	33.5	25.2	22	N
EC 30	Solid Barium	µg/g	230	EC 31	180	24.4	21	N
EC 30	Solid Cadmium	µg/g	720	EC 31	840	15.4	20	Y
EC 30	Solid Chromium	µg/g	39	EC 31	36	8	25	Y
EC 30	Solid Copper	µg/g	39	EC 31	41	5	25	Y
EC 30	Solid Nickel	µg/g	880	EC 31	950	7.7	25	Y
EC 30	Solid Lead	µg/g	28	EC 31	31	10.2	25	Y
EC 30	Solid O&G	µg/g	70000	EC 31	35000	66.6	22	N
EC 29	TCIP Arsenic	mg/L	<0.03	EC 30	<0.03	0.0	35	Y
EC 29	TCLP Barium	mg/L	<1.0	EC 30	<1.0	0.0	35	Y
EC 29	TCLP Cadmium	mg/L	8.8	EC 30	9.0	15.4	35	Y
EC 29	TCLP Chromium	mg/L	<0.1	EC 30	<0.1	0.0	35	Y
EC 29	TCLP Copper	mg/L	0.04	EC 30	0.04	0.0	35	Y
EC 29	TCLP Lead	mg/L	<0.1	EC 30	<0.1	0.0	35	Y
EC 29	TCLP Mercury	mg/L	<0.01	EC 30	<0.01	0.0	35	Y
EC 29	TCLP Nickel	mg/L	5.7	EC 30	6.6	14.6	35	Y
EC 29	TCLP Selenium	mg/L	<0.05	EC 30	<0.05	0.0	35	Y
EC 29	TCLP Silver	mg/L	<0.05	EC 30	<0.05	0.0	35	Y
EC 29	TCLP Zinc	mg/L	1.2	EC 30	1.6	28.6	35	Y
EC 32	Barium	mg/L	0.0051	EC 33	0.0045	12.5	20	Y
EC 32	Cadmium	mg/L	0.13	EC 33	0.14	7.4	20	Y
EC 32	Chromium	mg/L	<0.001	EC 33	<0.001	0.0	15	Y
EC 32	Copper	mg/L	0.017	EC 33	0.015	12.5	20	Y
EC 32	Nickel	mg/L	0.64	EC 33	0.67	4.6	18	Y
EC 32	Lead	mg/L	<0.01	EC 33	<0.01	0.0	20	Y
EC 35	Alkalinity	mg/L	22	EC 36	20	9.5	10	Y
EC 38	TSS	mg/L	15	EC 39	26	53.7	20	N
EC 41-42	O&G	mg/L	12.5	EC 43-44	11.5	9	22	Y

REPRESENTATIVENESS CALCULATIONS

<i>CTC ID</i>	<i>Parameter</i>	<i>Units</i>	<i>Sample Value</i>	<i>Duplicate CTC ID</i>	<i>Duplicate Value</i>	<i>% Difference</i>	<i>RPD % Limits</i>	<i>RPD Met Y/N</i>
Engine Shop Part Cleaner								
ES 01	Alkalinity	mg/L	2000	ES 02	2000	0.0	10	Y
ES 03	TSS	mg/L	250	EC 04	250	0.0	20	Y
ES 05	O&G	mg/L	1600	ES 06	1600	0.0	22	Y
ES 07	Barium	mg/L	0.18	ES 08	0.17	9.7	20	Y
ES 07	Cadmium	mg/L	12	ES 08	11.7	2.5	20	Y
ES 07	Chromium	mg/L	<0.001	ES 08	<0.001	0.0	15	Y
ES 07	Copper	mg/L	1.1	ES 08	1.13	2.7	20	Y
ES 07	Nickel	mg/L	1.8	ES 08	1.11	47.5	18	N
ES 07	Lead	mg/L	0.12	ES 08	0.13	8	20	Y
ES 09	Alkalinity	mg/L	2000	ES 10	2000	0.0	10	Y
ES 11	TSS	mg/L	140	ES12	180	25	20	N
ES 13	O&G	mg/L	1000	ES 14	1100	9.5	22	Y
ES 15	Barium	mg/L	0.012	ES 16	0.035	97.8	20	N
ES 15	Cadmium	mg/L	11	ES 16	11	0.0	20	Y
ES 15	Chromium	mg/L	<0.001	ES 16	<0.001	0.0	15	Y
ES 15	Copper	mg/L	1.2	ES 16	1.0	9.5	20	Y
ES 15	Nickel	mg/L	1.1	ES 16	1.1	0.0	18	Y
ES 15	Lead	mg/L	0.11	ES 16	0.12	8.7	20	Y
ES 17	Solid Barium	µg/g	220	ES 18	160	40.9	21	N
ES 17	Solid Cadmium	µg/g	160	ES 18	150	6.5	20	Y
ES 17	Solid Chromium	µg/g	4.2	ES 18	11	89.5	25	N
ES 17	Solid Copper	µg/g	140	ES 18	160	6.9	25	Y
ES 17	Solid Nickel	µg/g	20	ES 18	18	10.5	25	Y
ES 17	Solid Lead	µg/g	40	ES 18	35	13.3	25	Y
ES 17	Solid O&G	µg/g	620	ES 18	410	40.8	22	N
ES 17	TCIP Arsenic	mg/L	<0.03	ES 18	<0.03	0.0	35	Y
ES 17	TCLP Barium	mg/L	<1.0	ES 18	<1.0	0.0	35	Y
ES 17	TCLP Cadmium	mg/L	1.1	ES 18	0.99	10.5	35	Y
ES 17	TCLP Chromium	mg/L	<0.1	ES 18	<0.1	0.0	35	Y
ES 17	TCLP Copper	mg/L	0.21	ES 18	0.18	15.4	35	Y
ES 17	TCLP Lead	mg/L	<0.1	ES 18	<0.1	0.0	35	Y
ES 17	TCLP Mercury	mg/L	<0.01	ES 18	<0.01	0.0	35	Y
ES 17	TCLP Nickel	mg/L	0.10	ES 18	0.09	10.5	35	Y
ES 17	TCLP Selenium	mg/L	<0.05	ES 18	<0.05	0.0	35	Y
ES 17	TCLP Silver	mg/L	<0.05	ES 18	<0.05	0.0	35	Y
ES 17	TCLP Zinc	mg/L	0.33	ES 18	0.3	9.5	35	Y
AGE Part Cleaner								
AGE 01	Alkalinity	mg/L	660	AGE 02	550	19.1	10	N
AGE 01	TSS	mg/L	830	AGE 02	700	17.0	20	Y
AGE 03	Glycol Ether	mg/L	660	AGE 04	640	3.1	10	Y
AGE 05	Liq. O&G	mg/L	390	AGE 06	390	0.0	22	Y
AGE 05	Liq. O&G	mg/L	390	AGE 07	410	5.0	22	Y
AGE 08	Barium	mg/L	1.4	AGE 09	1.4	0.0	20	Y
AGE 08	Cadmium	mg/L	0.40	AGE 09	0.42	4.9	20	Y
AGE 08	Chromium	mg/L	0.72	AGE 09	0.73	1.4	15	Y
AGE 08	Copper	mg/L	1.5	AGE 09	1.4	0.0	20	Y
AGE 08	Nickel	mg/L	1.0	AGE 09	1.0	0.0	18	Y

REPRESENTATIVENESS CALCULATIONS

<i>CTC ID</i>	<i>Parameter</i>	<i>Units</i>	<i>Sample Value</i>	<i>Duplicate CTC ID</i>	<i>Duplicate Value</i>	<i>% Difference</i>	<i>RPD % Limits</i>	<i>RPD Met Y/N</i>
AGE 08	Lead	mg/L	2.3	AGE 09	2.1	9.1	20	Y
AGE 08	Barium	mg/L	1.4	AGE 10	1.3	7.4	20	Y
AGE 08	Cadmium	mg/L	0.40	AGE 10	0.4	0.0	20	Y
AGE 08	Chromium	mg/L	0.72	AGE 09	0.69	4.3	15	Y
AGE 08	Copper	mg/L	1.5	AGE 10	1.4	6.9	20	Y
AGE 08	Nickel	mg/L	1.0	AGE 10	0.94	6.2	18	Y
AGE 08	Lead	mg/L	2.3	AGE 10	2.1	9.1	20	Y
AGE 23	Alkalinity	mg/L	160	AGE 24	200	10.	10	Y
AGE 23	TSS	mg/L	150	AGE 24	170	12.5	20	Y
AGE 21	Glycol Ether	mg/L	660	AGE 22	650	1.5	10	Y
AGE 18	Liq. O&G	mg/L	150	AGE 19	130	14.2	22	Y
AGE 18	Liq. O&G	mg/L	150	AGE 20	130	14.2	22	Y
AGE 15	Barium	mg/L	0.0098	AGE 16	0.0089	13.0	20	Y
AGE 15	Cadmium	mg/L	0.36	AGE 16	0.354	2.8	20	Y
AGE 15	Chromium	mg/L	<0.001	AGE 16	<0.001	0.0	15	Y
AGE 15	Copper	mg/L	0.26	AGE 16	0.258	0.1	20	Y
AGE 15	Nickel	mg/L	0.8	AGE 16	0.772	3.8	18	Y
AGE 15	Lead	mg/L	1.12	AGE 16	1.12	0.0	20	Y
AGE 15	Barium	mg/L	0.0098	AGE 17	0.0099	1.0	20	Y
AGE 15	Cadmium	mg/L	0.36	AGE 17	0.35	2.8	20	Y
AGE 15	Chromium	mg/L	<0.001	AGE 17	<0.001	0.0	15	Y
AGE 15	Copper	mg/L	0.26	AGE 17	0.26	0.0	20	Y
AGE 15	Nickel	mg/L	0.8	AGE 17	0.76	2.5	18	Y
AGE 15	Lead	mg/L	1.12	AGE 17	1.1	0.0	20	Y
AGE 11	Solid O&G	µg/g	9000	AGE 12	12000	28.6	22	N
AGE 11	Solid Barium	µg/g	110	AGE 12	100	9.5	21	Y
AGE 11	Solid Cadmium	µg/g	3.6	AGE 12	3.6	0.0	20	Y
AGE 11	Solid Chromium	µg/g	24.	AGE 12	28.7	18.9	25	Y
AGE 11	Solid Copper	µg/g	39.	AGE 12	45.1	14.3	25	Y
AGE 11	Solid Nickel	µg/g	16.0	AGE 12	18.9	17.1	25	Y
AGE 11	Solid Lead	µg/g	41.	AGE 12	45.5	11.5	25	Y
AGE 13	TCIP Arsenic	mg/L	<0.03	AGE 14	<0.03	0.0	35	Y
AGE 13	TCLP Barium	mg/L	<1.0	AGE 14	<1.0	0.0	35	Y
AGE 13	TCLP Cadmium	mg/L	0.12	AGE 14	0.11	8.7	35	Y
AGE 13	TCLP Chromium	mg/L	<0.1	AGE 14	<0.1	0.0	35	Y
AGE 13	TCLP Copper	mg/L	0.1	AGE 14	0.1	0.0	35	Y
AGE 13	TCLP Lead	mg/L	<0.1	AGE 14	<0.1	0.0	35	Y
AGE 13	TCLP Mercury	mg/L	<0.01	AGE 14	<0.01	0.0	35	Y
AGE 13	TCLP Nickel	mg/L	0.07	AGE 14	0.09	0.08	35	Y
AGE 13	TCLP Selenium	mg/L	<0.05	AGE 14	<0.05	0.0	35	Y
AGE 13	TCLP Silver	mg/L	<0.05	AGE 14	<0.05	0.0	35	Y
AGE 13	TCLP Zinc	mg/L	1.2	AGE 14	1.8	40.0	35	N

APPENDIX E

DIETHYLENE GLYCOL MONOBUTYL ETHER ANALYSIS

AMTEST
LABORATORIES

December 15, 2000

Concurrent Technology Corporation
Marion Rideout

Re: Glycol Analysis

At AMTest, we analyze glycol by GC/FIU. The method is one provided by Texaco 10 years ago, which they developed. We have been routinely using this method since then. The method uses a GC with FID detector and a DB wax column. Each sample was diluted with reagent alcohol (0.50 mL sample to 4.50 mL alcohol) and injected directly onto the column. The standard was provided by your client.

ANALYSIS OF GLYCOLS FOR CTC

I) Sample preparation

- 1). Dilute 0.5 mL of sample to 5 mLs final volume with reagent alcohol.
- 2). Filter sample if needed to remove solid material through a 0.45 um Teflon filter.
- 3). Transfer approximately 2mLs to a GC vial for analysis.

II) GC/Analysis

- 1). GC Parameters

DB Wax Column 30 m O.53 um I.D. 1 um Film thickness

Detector Temperature 250 C

Injector Temperature 200 C

Initial Temperature 30 C

Initial Time 5.00 min.

Rate 5 C/min.

Final Temperature 200

Final Time 0 min.

- 2). Prepare 5 point standard curve covering the range of 5 ppm to 100 ppm.
- 3). Inject 2 ul of standards and samples.
- 4). Quantitate results based on the linear curve established
- 5). Sample exceeding the standard curve must be diluted and re-analyzed.