

# Subpart X Permitting Group Case Study

Hurd Trailer

# Hurd Trailer

- Paul – South Carolina
- Brian – Alabama
- Jack – South Carolina

# Issues for Permitting

- Operating conditions
  - $\leq 24$  times/year
  - Notification
  - Risk assessment or air pollution control
  - Mobile source
  - Recycling or disposal of residuals
- Emergency conditions
  - $< 5$  times/year
  - Reporting
  - Air monitoring
  - \$ fee

# Standard Conditions

- Effect of permit – 5 years
- Severability
- Signatory requirement
- Documents to be maintained by owner
  - Operator certification
  - Proper disposal of residuals
  - Documentation of quantity treated
  - Structural integrity testing/inspection
- Annual waste minimization report

# General Unit Conditions

- Security
- Inspection requirements
- Design and operation of unit
- Requirements for incompatible waste
- Required equipment
- Testing and maintenance – after each event
- Communications and alarm system
- Emergency procedures and coordinator

# General Unit Conditions (cont'd)

- Operating record
- Closure requirements
- Disposal of residuals properly
- Financial responsibility
- Only treatment may occur in Hurd trailer (no storage or transportation)

# Special Conditions

- Notification of agency prior to each event
  - Waste identification
    - D003 (and may carry D008)
      - Small caliber ammunition (22 cal to 20 mm; max per event – 100 lbs.)
      - Class “C” fireworks (1.4.G; max per event – 30 lbs.)
  - Method of treatment
    - Hurd trailer
      - Length: 12 feet
      - Width: 6 feet
      - Height: 6 feet
      - Stack Height: 6 feet
      - Top inside diameter: 15.13 feet

# Special Conditions (cont'd)

- Fueled by LP gas (5 lbs/hour capacity)
- Lead recovery door (beneath)
- Entrance door
- Screen above floor (for waste loading)
- Computation of required burn time
- Location
  - Minimum 50 feet setback distance – per 40 CFR §264 (note: setback distance minimum to be determined based on calculated distance setback for unit failure)
  - Obtain written permission from property owner
  - Treatment shall occur between 8 am and 5 pm, Monday - Friday

# Special Conditions (cont'd)

- Disposal of residue
  - Inspect residue to ensure proper treatment
  - Remove residue the same day treatment occurs
  - Make waste determination of residue
    - Hazardous
    - Non-hazardous
    - Recyclable material
  - Document destination/disposal of residue

# Special Conditions (cont'd)

- Required equipment
  - Air pollution control device (APCD) (to be negotiated with owner to address issues such as PM 10, Pb, projectibles)
- Compliance schedule
  - APCD to be installed prior to use
  - Notification of the agency at least 2 weeks before event
  - Final report due within 30 days of event
    - Documentation of residue disposal
    - Length of event
    - Documentation of any events not described in notification

# Inspection Checklist

- Structural integrity of the unit
- Air pollution control equipment is functional
- Structural integrity of the trailer
- Integrity of LP gas
- Residue has been properly removed from Hurd trailer to avoid storage issues