

Subpart X Permitting Group Case Study

Open Burn Unit

General Conditions

- Effects of permit
- Permit actions
- Severability
- Duties and requirements
- Signatory requirements
- Documentation
- Closure/post-closure plan
- Contingency plan
- Security
- Training

General Conditions (cont'd)

- Reporting/notification
- Waste analysis
- Risk assessment
- LDR evaluation
- Compliance schedules
- Waste minimization
- Health and safety plan

Operating Conditions

- Elevate pan
- Professional Engineering approved screen and pan design
- Pre/post-burn structural integrity pan inspection
- Tie down screen
- Cover pan when not in use
- Use rounded screen for potential pop-out and flat screen for burn dispersion of ash
- Clean pans with dedicated disposable equipment
- Pick-up fragments and inspect area after treatment as described in risk assessment
- Screen doors must remain closed unless loading/unloading

Operating Conditions (cont'd)

- Secondary containment required – facility proposed
- Run-on/run-off control
 - Buffer between pan and screen
 - Man-made wetlands beyond unit boundary
- Only black powder may be used for initiating ignition
- Treatment Operations
 - Remain 50 ft. from treatment area during burning
 - Burn time less than 5 minutes
 - Alternate pans when igniting
 - Operate during daylight hours
 - No liquid wastes

Operating Conditions (cont'd)

- No solvents
- No mixture of munitions/pyrotechnics/fireworks
- Meteorological conditions
 - Wind speed $3 < \varnothing < 20$ mph
 - Wind direction
 - No chance of precipitation
 - Cloud height
 - Air temperature
- Determine maximum amount per day/year
- No farming, grazing, or fishing based on risk assessment determination

Operating Conditions (cont'd)

- Segregate units as special units for potential TCLP waste
- Every year re-evaluate treatment process
- Residues placed in 55-gallon drums in a satellite accumulation area
- Modeling for air emissions to determine permit conditions
- Modeling for normal/upset operating conditions (site specific)
- Sample drinking water wells – make sure sampling includes appropriate constituents

Monitoring

- Quarterly sampling of the following media:
 - Groundwater
 - Soil
 - Air
 - Surface water

Inspection Checklist

- Physical conditions
 - Burn units
 - Burn pit meets technical specifications in unit description
 - Integrity of primary treatment pan (warping, deterioration, seams, bolts & clips, cracks, rusting, scaling)
 - Condition of screens (large openings, pop-out potential)
 - Support structure (differential settling, adequate clearance from soil)
 - Secondary containment
 - Integrity (liners, water run-off control, damage to berm)
 - Ponding water
 - Ash/residue inside containment area

Inspection Checklist (cont'd)

- Operating Conditions
 - Emergency and safety concerns
 - Communications check (fire, police, government)
 - PPE check (gloves, clothing, etc.)
 - Fire equipment
 - Storage area
 - Containers (condition, labeling, manifests)
 - Containment area (covered, containment grounded)
 - Transfer methods
 - Satellite storage
 - Records

Inspection Checklist (cont'd)

- Precipitation controls
 - Run-on/run-off control
 - Collection system
 - Roll-off lid and covers used
- Weather conditions
 - Wind direction/speed/wind sock
 - Temperature
 - Inversions and forecasts
- Treatment area
 - Vegetation condition
 - Fire prevention clearances
 - Security devices (fencing, signs, etc.)

Inspection Checklist (cont'd)

- Records/reporting
 - SOP
 - Operating log (burn amounts, burn type, number pans used, burn time, appearance)
 - Environmental monitoring reports (soil, surface water, groundwater)
 - Weather reporting (wind speed/direction, precipitation/forecast, air temperature, inversions, data source)
 - WAP