4.1 Physical and Chemical Characteristics of Waste and Residues

The permit application for a miscellaneous unit, must include waste characterization data that are sufficient to assure that the wastes managed by the facility can be (1) adequately and safely stored at the facility and (2) effectively treated in the miscellaneous unit. For each hazardous waste and hazardous debris treated, stored, or disposed of at the facility, the permit application must include a description of the waste and its EPA or state hazardous waste code, its hazard characteristics, the basis for its designation as hazardous, and the results of chemical and physical analyses of representative samples of the waste. However, certain types of wastes, such as

those that usually are treated at OB/OD units, may not be analyzed easily or safely, because of their reactivity. For such wastes, existing information such as published or historical analytical data, knowledge of the chemical substances used in the manufacturing process and product formulations, or data provided by off-site generators may be presented in the permit application to fulfill this requirement.

For all Subpart X units, waste characterization data must demonstrate that the wastes are compatible with the construction materials of the unit. For example, for Subpart X units that have geomembrane liners, methods described in SW-846 can be used to demonstrate that hazardous wastes are compatible with the liner(s). For units that do not have secondary containment, the data also must demonstrate that the wastes do not contain free liquids. EPA's standard protocol for determining whether free liquids are present is the Paint Filter Liquids Test method 9095 in SW-846.

For Subpart X units that employ thermal treatment (other than OB units), methods applicable to incinerators, boilers, or industrial furnaces may be used. For such units, waste characterization data must include the following, as appropriate for the type of controlled thermal treatment being conducted: physical form of the waste; viscosity of liquids; identification and approximate quantification of the Appendix VIII hazardous organic constituents reasonably expected to be present in the waste; concentrations of chlorine and metals; and ash content. If blending is to occur before firing, the permit application must identify the blending material and blending ratios and describe blending procedures.

Permit applications for units treating energetic wastes should clearly identify the waste item (e.g., name, munition item type, etc.), EPA waste code, waste composition data (including nonenergetic components), waste properties and waste treatment quantities. The waste description information should be provided as a function of energetic classification and munition category. Example energetic classifications are presented below:

- Propellants are low explosive agents such as explosive powder or fuel that provides the energy for propelling ordnance to the target. Propellants include both rocket and gun propellants.
- Primary or initiating explosives are high explosives generally used in small quantities to detonate larger quantities of high explosives. Initiating explosives will not burn, but if ignited, they will detonate. In general, propellants are ignited by applying a flame, while bursting explosives are ignited by a severe shock. The initiating device used to set off a propellant is called a primer, and the device used to initiate the reaction of a bursting explosive is called a detonator.
- Auxiliary or booster explosives are used to increase the flame or shock of the initiating explosive to ensure that the burster charge performs properly. High explosives used as auxiliary explosives are less sensitive than those used in initiators, primers, and detonators, but are more sensitive than those used as filler charges or bursting explosives.
- Bursting explosives, burster charges, or fillers are high explosive charges that are used alone or as part of the explosive charge in mines, bombs, missiles, and projectiles.
- Pryotechnics are low explosives used to send signals, to illuminate areas of interest, to simulate other weapons during training, and as ignition elements for certain weapons. Pyrotechnic compositions are considered low explosives because of their low rates of combustion. Examples of pyrotechnics are illuminating flares, signaling flares, smoke generators, tracers, incendiary delays, and photo-flash compounds.
- Small arms munitions contain projectiles that are 0.5 inches or less in caliber and no longer than

approximately 4 inches. Unexploded small arms munitions may explode if thrown into a fire or struck with a sharp object.

• Hand grenades are small explosive -or chemical -type munitions designed to be thrown at short range. All greandes are composed of three main parts: a body, a fuze with a pull ring and safety clip assembly, and a filler.

Small arms munitions are typically not appropriate for OB/OD treatment because they can generally be safely transported offsite for treatment by alternative technologies.

Many of the energetic waste to be treated by OB/ OD units may be characterized by manufacturers and other sources. For example, the Munitions Items Disposition Action System (MIDAS) program, operated by the U.S. Army, includes a database of the composition of many military munitions. Although all of the military munition items are not currently included, a representative number of items have been characterized and additional items are routinely added. The MIDAS web site is at www.dac.army.mil/default1.html (registration is required for access).

However, there are major complicating factors regarding providing detailed waste description information for potential future OB/OD treatment as follows:

- Potential for a wide range of energetic items to be treated.
- Variability of waste composition between items and potentially even for the same items (because many of the military munition specifications are performance based, not composition based).
- Uncertainties for item-specific treatment quantities.

Thus, the permit application should include waste description information based on historical data (a minimum of 5 years) and for future OB/OD

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operations. In order to address the uncertainties associated with the waste description information and quantities, the applicant should provide sufficient information in the permit application to demonstrate that OB/OD is the appropriate treatment for a waste and to establish risk-based levels for permit conditions. This approach is similar to defining the potential waste streams for a hazardous waste incinerator and or industrial furnace.



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