

4.3.2.2 Solid Residues

Permit applicants should provide permit writers with a description of the process to be used to characterize solid residues such as scrap metal generated by Subpart X treatment units. In general, the methods used to evaluate as-generated residues may be applicable to residues generated from the treatment process. In some cases, visual inspection and knowledge of a munitions expert may be sufficient to determine whether the materials should be subjected again to OD or whether they can be treated or disposed of by other means. In other cases, standard EPA methods may be used to characterize solid residues generated from treatment in Subpart X units. For example, ash removed from OB operations may be fairly innocuous and may be analyzed only for metals and organic constituents to determine treatment and disposal options, as mandated by the LDRs.