



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 17 1987

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Major Jesse Cabellon
U.S. Army Material Command
5001 Eisenhower Avenue
Alexandria, VA 22333-0001

Dear Major Cabellon:

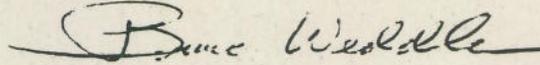
This letter is in response to your request to Sonya Stelmack concerning confirmation of the Environmental Protection Agency's (EPA's) policy on deactivation (popping) furnaces. As we have stated verbally and in past correspondence (copies enclosed) to the Department of Defense and Region VII, EPA classifies popping furnaces as incinerators.

Under 40 CFR 260.10, "incinerator" is defined as "any enclosed device using controlled flame combustion that neither meets the criteria for classification as a boiler nor is listed as an industrial furnace." Popping furnaces meet the definition of incinerator because the process that occurs in the enclosed unit is controlled flame combustion. The reaction which occurs is initiated by controlled flame heating and the resulting detonation products are combusted.

Existing units are thus subject to the 1989 statutory deadline for permitting of incinerators. Section 3005(c)(2)(C) of HSWA states that interim status shall terminate on November 19, 1989, for incinerators which have not been permitted, and for which a permit application was not submitted by November 19, 1986. According to information provided by your office, there are two popping furnaces (Lake City Army Ammunition Plant in Missouri and McAlester Army Ammunition Plant in Oklahoma) for which Part B applications have not been submitted, and which plan to burn only munitions classified as non-hazardous. These facilities should be in touch with their permitting authorities regarding closure requirements associated with the cessation of hazardous waste burning.

I trust that you will disseminate this information to the appropriate personnel at the popping furnace facilities. Sonya Stelmack will continue to work with you and the Regional offices to define the permitting approach for popping furnaces. If you have any questions, feel free to contact Sonya at (202) 382-4500.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Weddle". The signature is written in dark ink and is positioned above the typed name.

Bruce Weddle
Director
Permits and State Programs Division

Enclosures

cc: Incinerator Permit Writers' Workgroup
Connie Nakahara, Utah Department of Health
Suzanne Rudzinski
Liz Cotsworth
Jim Michael
Chris Grundler