START

0028084

TO: CLIFF CLARK 4/2/92

FROM: DAN DUNCAN
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CC: PAUL STASCH

SUBJECT: **COMMENTS ON CHAPTERS 3 AND 4 (REV1)**

PAGE	COMMENT
4-6	Spiking should be included in the worst case scenario. It does not appear to have been included in the carbon filter design. Ensure carbon filters have adequate capacity for spiking of the waste water.
Table	Define "Administrative Controls" and specify what these controls are.
3-4	The spiked feed must be included in the operating envelope. The five VOC's must be added to the operating envelope. Ensure that spiked materials are within the operating envelope limits.
3-6	Appendix VIII Constituents. Clarify the statement that there are no methods in SW 846 for 100 constituents. Specify the alternative methods that will be used to detect constituents for which there is no SW-846 method.
3-6	Specify the alternative analytical method to be used to detect the five other VOC's which will be added to the Operating Envelope.
Define	"Administrative Measures"and explain what specifc methods will be used to control spiking.
3-3	Table 3-3: Add Ammonia and five VOCs to the operating envelope and other appropriate parameters from the spiking list (e.g., volatiles).
Continuous Vapor Analyzer	Clarify "As benzene (.1ppm)" Specify the range that will be used and the level to be used as an indicator of breakthrough. More specifics on operation of monitor should be provided (e.g., number and level of calibration points, calibration gases to be used, etc.).
Fig 4-8	Monitoring of Granulated Carbon: Specify which parameters will be monitored e.g.pH, conductivity, flow rate.

4-17 Specify the route of the tanker truck from LERF to 1706-KE. Include diagram of the route and statement on suitablity of roadways to withstand anticipated loads.

4-20 Secondary containment. An evaluation must be provided demonstrating the suitability of the berm material for its intended use. Provide a stress analysis of the Porta-berm material. Analysis must include anticipated stopping speeds and loading conditions as they relate to material properties (e.g., puncture resistance, compressive strength, etc.).

More complete information on material properties should be provided (e.g., carbon black content (projected ultraviolet degradation in an uncovered environment), temperature tolerances, etc.) and methods used to determine material properties (e.g., establisted ASTM's). Provide literature information on compatablility of Berm Material, including any 9090 Testing data available.

Diagrams: All diagrams/flow sheets should be legible. Add Instrument Ranges, Expected Range, Accuracy, and Clibration Method of Monitoring Devices. Tie Table 4-3 with Table 4-4 for critical parameters. (EXAMPLE ATTACHED).

General: All Tables should reflect common units ppm vs ppm/ppb

Readiness Review: Specify that the Readiness Review file will be available for regulator review.

QA Data: Specify that QA Data summary sheets will be provided with the quarterly reports. An outline of what will be provided on the QA Data summary sheets should be provided in the application.

Table D-6-1
METAL PARTS FURNACE
PROCESS DATA

Item No.	Control Parameter	Measuring Device	Location	Instrument Range	Expected Range	Accuracy	Calibration Method No. 1 Frequency
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10[a,b,c]	Metal Parts Furnace Zone 2 Temperature TIC-141	Thermocouple	Furnace	0-2,500°F	1,250-1,750°F	±0.375% of Range	Inst. Calib Para. 2.4
11[a,b,c]	Metal Parts Furnace Zone 3 Temperature TIC-153	Thermocouple	Furnace	0-2,500°F	1,250-1,750°F	±0.375% of Range	Inst. Calib. Para. 2.4
12[a,b,c]	Afterburner Temperature TIC-65	Thermocouple	Afterburner	0-3,500°F	1,850-2,400°F	±0.375% of Range	Inst. Calib. Para. 2.4
13[c]	Afterburner Pressure PIC-70	Diaphragm	Afterburner	0 to 5.0 in. w.c.	-2.5 to -4.5 in. w.c.	±0.25% of Range	Inst. Calib Para. 2.2
14[c]	Metal Parts Furnace MPF-Furn-101 Pressure PDI-12	Diaphragm	Furnace	0 to -4.0 in. H_2O	-0.5 to -1.0 in. w.c.	0.25% of Range	Inst. Calib. Para. 2.2
15[c]	Metal Parts Furnace MPF-Furn-101 Exhaust Gas O_2 Analysis AI-508	Infrared Cell Analyzer	Furnace Exhaust Line (Extractive)	0-100 & 0-1,000 ppm	0-100 ppm	±1% of Range	Inst. Calib. Para. 1.1 & 1.2
16[c]	Metal Parts Furnace MPF-Furn-101 Exhaust Gas O_2 Analysis AI-33	Zirconium Oxide Cell Analyzer	Furnace Exhaust Line (Extractive)	0 to 25%	8.0 to 14%	±2% of Range	Inst. Calib. Para. 1.1 & 1.2
17[a,b,c]	MPF Afterburner Exhaust Gas CO Analysis AI-384	Infrared Analyzer	Afterburner Exhaust Line (Extractive)	0-100 to 0-1,000 ppm	0-50 ppm	±1.0% of Scale	Inst. Calib. Para. 1.1 & 1.2
18[a,b,c]	MPF Afterburner Exhaust Gas O_2 Analysis AI-82	Zirconium Oxide Cell Analyzer	Afterburner Exhaust Line (Extractive)	0 to 25%	6-12%	±2.0% of Range	Inst. Calib. Para. 1.1 & 1.2

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