

→ Bureau - Sub 3 - HWMS (E. Lynch, M. Talarauskis)



George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Southeast District - Annex Building
Post Office Box 12436
4041 N. Richards St.
Milwaukee, Wisconsin 53212
TELEPHONE: 414-961-2727
TELEFAX #: 414-961-2770

→ *[Handwritten signature]*

In Response Refer To: FID#246004330
County of Ozaukee
HW/NOTIF/ck421.894

August 2, 1994

Mr. Craig Bostwick
Corporate Manager, Environmental and Safety
Cook Composites and Polymers Co.
919 East 14th Avenue
North Kansas City, MO 64116

Subject: The Effects of NR 421.05 on the Hazardous Waste Incinerator
Cook Composites and Polymers, Co., (Cook)
340 Railroad Street, Saukville, WI
WID 980615439

Dear Mr. Bostwick:

With this letter, I will address the points of your May 9, 1994 letter to Mike Griffin regarding the minutes of the March 18, 1994 meeting between representatives of Cook and the Department of Natural Resources. I will just address the points that deal with hazardous waste management. The information I present here is based on review of the issues since the March 18, 1994 meeting.

3) We concur that the hazardous waste incinerator may be able to be used to control fumes from processes at the facility. After reviewing the file, I concur that the use of the incinerator to control fumes from reactors and thinning tanks throughout the Cook facility was addressed in the Feasibility Report and Plan of Operation (FRPO) and the February 9, 1988 approval of the FRPO. The FRPO stated that the incinerator was designed to accommodate the various manufacturing processes at the plant at the burning rate of 700 CFM. The FRPO approval limits the operation to a burning rate of 700 CFM of fumes. The FRPO also stated that the fumes would enter the incinerator at a separate inlet of the combination burner and that the fumes heating value would have a range of 40 to 230 BTU/CF. The information presented in the FRPO regarding the venting of the process fumes to the incinerator is very general and does not include much more information than I present here.

4) A permit modification could take up to 6 months to review. Hopefully with complete submittals and the availability of staff for timely review, review time can be minimized.

5) If Cook decided to control the process fumes in the incinerator at a rate of less than 700 CFM, the Department would still like to see more specific information on how this would be done. This information would include: an inventory of the process tanks, a layout showing the process tanks and their piping, a description on how the venting would be controlled to the

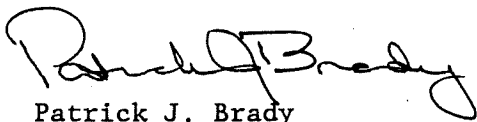
incinerator, a description of how the efficiency of the operation of the system will be evaluated, a description of safety procedures and emergency response in operation of the system, and other aspects of the FRPO that will require changing because of the operation of this system. There appears to be a good deal more to operating this unit than hooking it up and turning it on. Fumes from the tanks in the incinerator building were previously vented to the incinerator. This operation created damage to the refractory of the incinerator and was discontinued. Even though this was included in FRPO, I feel that before it can be operated more information will be needed and further evaluation will need to be done. I feel that the startup of the process venting is an extensive enough change that even at less than 700 CFM, a modification would be necessary.

Burning at greater than 700 CFM would to my understanding be an increase in the specified design capacity of the incinerator. Because of this, the Department would consider this to be an expansion.

I feel that information should be able to be provided which would not make a trial burn necessary. Given the present scenario of a similar waste stream, the information from the previous trial burn, and the parameters that are presently continuously monitored, a trial burn should not be necessary. If additional changes are made, I could not guarantee that a trial burn would not be necessary.

If you have any questions regarding this matter, please feel free to contact me at (414) 961-2717.

Sincerely,



Patrick J. Brady
Waste Management Engineer

c. SED Casefile (W. Ebersohl, P. Brady)
Bureau - SW/3 - HWMS (E. Lynch, M. Talarczyk) *JSU*
Mike Griffin - SED Air Management
Eric Naimark - Cook
Jim Rickun - RMT