



February 17, 2000

**MEMBER COMPANIES**

Dow Chemical U.S.A.  
Eastman Chemical Company  
Eastman Kodak Company  
Eli Lilly and Company  
Lafarge Corporation  
LWD, Inc.  
3M  
Novartis Crop Protection, Inc.  
Onyx Environmental Services, LLC  
Von Roll America, Inc.

RCRA Docket Information Center  
Office of Solid Waste (5305W)  
U. S. Environmental Protection Agency Headquarters  
401 M Street, SW  
Washington, DC 20460

RE: Docket No. F-99-WH2P-FFFFF

**ASSOCIATE MEMBERS**

Cook-Joyce, Inc.  
Croll-Reynolds Clean Air Tech.  
Crown Andersen, Inc.  
ENSR  
Focus Environmental, Inc.  
Sigrist-Photometer AG

**INDIVIDUAL LIFE TIME MEMBERS**

Ronald E. Bastian, PE  
Ronald O. Kagel, PhD

**ACADEMIC MEMBERS**  
(include faculty from the following institutions:)

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University of Arizona  
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Los Angeles  
Irvine  
University of Dayton  
University of Kentucky  
University of Utah

The Coalition for Responsible Waste Incineration (CRWI) is pleased to submit comments on the Hazardous Waste Identification Rule (HWIR): Identification and listing of Hazardous Waste; Proposed Rule (64 FR 63382, November 19, 1999). CRWI represents sixteen companies with hazardous waste combustion interests. These companies account for a significant portion of the U.S. capacity for hazardous waste combustion. In addition, CRWI is advised by a number of academic members with research interests in hazardous waste combustion. Since its inception, CRWI has encouraged its members to reduce the generation of hazardous waste. However, for certain hazardous waste streams, CRWI believes that combustion is a safe and effective method of treatment, reducing both the volume and toxicity of the waste treated. CRWI seeks to help its member companies both to improve their operations and to provide lawmakers and regulators helpful data and comments.

CRWI would like to comment on the following three areas.

1. CRWI agrees with the Agency that residuals from wastes listed solely because they exhibit the ignitability, corrosivity, and/or reactivity characteristic should not continue to be defined as hazardous waste after the characteristic has been removed through treatment. Where incineration is successfully used to remove the ignitability characteristic, the resulting ash will not exhibit the ignitability characteristic and should no longer be treated as such. Thus, CRWI supports EPA's proposed action to exempt all 29 waste codes listed in Table 1 of

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the preamble (64 FR 63390) if they are de-characterized and meet all appropriate land disposal restriction treatment standards.

2. EPA specifically requested comments on whether F003 listed waste should be included because some of the solvents that are listed due to their ignitability characteristic could also be listed for toxicity as well. High-temperature incineration of organic compounds (especially ones listed due to an ignitability characteristic) will destroy those compounds. If those organic compounds no longer exist in the residual material, that material will not exhibit either the ignitability or the toxicity characteristic. Thus, the treatment for ignitability will also remove the toxicity characteristic. For this reason, CRWI supports including F003 in this exemption.
  
3. EPA also requested comments on the Chemical Manufacturers Association (CMA) suggested exclusions. CRWI wishes to comment only on the suggestion that residues derived from the combustion of hazardous waste be considered a new point of generation. CRWI agrees with CMA that the resulting ash is neither physically or chemically similar to the original listed waste and should be evaluated on its own merits for characteristics of being a hazardous waste. However, we are concerned that the creation of a new multi-source listing code (similar to F039) may result in additional testing. CRWI does not see the merits of requiring a complete battery of tests on incinerator ash simply because it now has its own multi-source listing code. As long as facility operators can use knowledge of the constituents of the original waste to decide which tests are appropriate for each batch of ash, CRWI supports this concept. However, CRWI cannot support the development of a multi-source listing code if it will result in additional testing.

Thank you for considering these comments. If you have any questions, please contact me (202-775-9869 or [crwi@erols.com](mailto:crwi@erols.com)).

Sincerely yours,

A handwritten signature in black ink that reads 'Melvin E. Keener'.

Melvin E. Keener, Ph.D.  
Executive Director

cc: CRWI members