

Roger J. Zipfel
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To:
cc:
Subject: FEP Sump Material Recovery TA

BACKGROUND

Currently waste material from the FEP sump is landfilled at the Letart Landfill. The FEP sump material contains 200-400 ppm C-8. This amount of C-8 makes the waste material hazardous based on DuPont classifications (C-8 is not a RCRA hazardous waste). Consequently this material is not able to be landfilled at the site's Dry Run Landfill or at any low cost non hazardous landfill.

Laboratory procedures have demonstrated the ability to remove most of the C-8 contained in the wet waste FEP material by drying the material in an inerts purged dryer. Sale of this material could be possible if C-8 environmental risks were minimal (below the Community Exposure Guideline for C-8).

Initial test work has been conducted with Ohio Valley B&B to determine if adequate C-8 removal could be demonstrated on a commercial basis. This test work has not successfully demonstrated scale-up of the laboratory data. Additional test work is required to establish dryer operating conditions (% moisture and inerts flow rates) to maximize C-8 removal.

TECHNICAL BASIS

C-8 from FEP waste material has been demonstrated in the laboratory by drying material that contains 20-50% moisture in a tray dryer for 48 hrs. C-8 levels have been reduced from approximately 300 ppm to 1-10 ppm. C-8 removal from the waste material occurs due to the sweeping action of the vaporizing water in the drying step.

Similar results are noted in the FEP plant where FEP fluff is routinely dried in the FEP Torus Disc dryers. This drying step reduces C-8 levels to 0-10 ppm.

Both of these drying operations involve the use of an inerts purge to facilitate both water and C-8 removal.

TEST GOALS

To establish an operating procedure to enable the processing of waste FEP material with minimal risk of C-8 exposure to the environment. The current CEG of 4 micrograms per day of exposure will be used as the determinant of success.

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TEST PROCEDURES

- 1) The FEP plant will packout up to 6000 pounds of waste FEP in plastic lined black drums for release to Ohio Valley B&B.
- 2) Test material is to be sampled for moisture and C-8 content.
- 3) Ohio Valley B&B will dry the material at 150 oC in an hot recirculating oven till the material is dry.
- 4) Final product will be sampled for C-8 content.
- 5) C-8 airborne levels will be monitored at Ohio Valley B&B.
- 6) Determination will be made of the environmental exposure to C-8 due to this procedure. This will be done based upon the results of steps 4 and 5 above.
- 7) Final waste handling procedures will be established based upon the results of this test work.

PRODUCT PACKAGING AND RELEASE

This TA documents the release of the first 6000 pounds of this material. Product release will be done under the control of TMA 95-002. Material will be packaged into black drums with a plastic liner. The material is to be labeled as TE- 9294.

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