

NOV 13, 1984

Jay Triplett  
Hazardous Waste Coordinator  
Mountain View Fabricating, Inc.  
Highway 60 East  
Mountain View, Missouri 65548

Re: Additional information and clarification of Delisting Petition #0561 for Mountain View Fabricating, Inc.

Dear Mr. Triplett:

The purpose of this letter is to collect data necessary to complete the review of the delisting petition for Mountain View Fabricating, Inc. (#0561) dated July 18, 1984. In this petition, Mountain View Fabricating seeks an exclusion under §260.22 of the RCRA regulations for their electroplating wastewater treatment sludge listed as EPA Hazardous Waste No. F006.

The additional information we request is necessary to develop a better understanding of the site conditions and processes that influence the composition of the wastes. Specifically, we request that the following information should be provided:

- 1) Identify all raw materials utilized in the manufacturing and treatment processes. Provide information on all solvents, acids, cleaners, and surface preparation agents used in these processes. Include Material Safety Data Sheets for all materials listed by trade name, brand name, or any other name which does not precisely describe the contents of the substance.
- 2) Describe the manufacturing processes used by Mountain View Fabricating and provide a schematic diagram that indicates where the raw materials enter the processes.
- 3) Describe the sources and types of oils and/or hydraulic fluids which may enter the waste stream. Report total oil and grease content of four representative waste samples by using the enclosed methods.
- 4) Briefly describe the waste disposal program utilized by Mountain View Fabricating prior to November 1980, the waste disposal program currently in operation, and proposed waste disposal practices should your petition be approved. Describe the methods of treatment, storage, and disposal. Provide names and locations of off-site TSD facilities where applicable.

- (5) Furnish personnel qualifications (preferably a brief resume) for Lisa Berger and Jay Triplett, including education and job experience.
- 6) Describe sampling and preservation techniques used in testing. Cite specific method numbers when applicable. Perform total constituent analysis of waste for each of the EP toxic metals and nickel for at least one additional representative sample.
- 7) Quality assurance procedures followed during sampling and analysis should be described. Results from the Method of Standard Additions should be included for at least one EP Toxicity test on each EP metal, nickel, and cyanide. All spike concentrations and recovery results should be provided.
- 8) Representative waste samples must be evaluated using the hazardous waste characteristics for corrosivity, reactivity, and ignitability.
- 9) Indicate if Mountain View Fabricating, is facing any impending enforcement action. If so, please describe the nature of the action.
- 10) Discuss the reasons why you believe your sampling scheme accurately represented the variability of the constituent concentrations of the wastes. Your explanation should include information concerning the consistency in the manufacturing process and should identify any variation in usage of raw materials in your production schedules.
- 11) Total organic carbon should be tested and reported on at least four representative samples using Method No. 415.1-Total Organic Carbon (copy enclosed).
- 12) Provide EP Toxicity test results for cyanide using the EP extraction procedure, substituting distilled water for acetic acid (minimum of four samples).
- 13) If the cyanide test run in (12) indicates that there is an interference in the waste producing non-representative results, then an explanation of this interference should be submitted and the following cyanide tests should be run on at least four representative samples: Test Method for the Determination of Reactive Cyanide and Sulfide Containing Wastes, Final Method; and Proposed Revision of D2036-81C for the Determination of Reactive Cyanide in Solid Wastes (copies available from the Agency upon request).
- 14) Report initial and final pH data on the hexavalent chromium EP analyses. If the pH drops from an alkaline or neutral value to an acidic value, then four alkaline digestions of the waste analyzing for

hexavalent chromium would be required using Method No. 3060 from Test Methods for Evaluating Solid Waste (SW-846, 2nd edition).

These questions must be addressed and satisfied before the review can be completed. In order to ensure that your petition is reviewed in a timely manner, it is important that you submit the requested information to our office as soon as possible. If you have any questions regarding the requests outlined above, please contact me at (202) 382-4488.

Sincerely,

Scott J. Maid  
Environmental Protection Specialist Waste Identification Branch (WH-562B)

Enclosure