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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

JUN 14 1990

MEMORANDUM

SUBJECT: Disposal of Personal Protective Gear

FROM: Sylvia K. Lowrance, Director  
Office of Solid Waste

TO: David Ullrich, Acting Director  
Waste Management Division, Region V

This memorandum is in response to your letter regarding the disposal of personal protective gear (PPG). As you noted, discarded PPG may be considered a hazardous waste either due to surface contamination or because it exhibits a hazardous characteristic. Judging by the data that you presented, you have suits that, when discarded, are a toxic hazardous waste (due to lead) regardless of whether they were contaminated at a site.

For the purpose of compliance with the Land Disposal Restrictions, treatment options for PPG were addressed in the Third Third final rule's discussion of organic debris (55 FR 22555, June 1, 1990). For your immediate reference, I have attached the pertinent pages of the final rule. While the final rule does not preclude surface decontamination, organic debris will often have to be incinerated prior to stabilization of the metal constituents to comply with the treatment standards.

As you know, all wastes contained in the Third Third were granted a 90-day national capacity variance. Thus, during the variance, wastes not treated in compliance with the applicable treatment standards may be disposed. However, if the waste is disposed of in a surface impoundment or landfill, they may go to such units only if they meet the minimum technological requirements. Furthermore, wastes granted this variance must be in compliance with the California list prohibitions if they are applicable.

After the effective date, the only other option is to obtain a treatability variance. This option is clearly not practical for one set of PPG and probably the variance is not warranted given the fact that the treatment standards are achievable--albeit at a

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higher cost. My staff will contact OERR to see if they want to pursue any generic solutions such as identifying a vendor of PPG that has low levels of hazardous constituents or whether a generic treatability variance for PPG is feasible. If I can be of further assistance, please don't hesitate to contact me.

ATTACHMENT

cc: Waste Management Division Directors, Region I-X

Russ Wyer  
Dave Fagan  
Paul Nadeau  
Rod Turpin