

9486.1981(01)

GRAY IRON FOUNDRY WASTE DISPOSAL

June 18, 1981

Mr. Cary Perket
Environmental Engineering & Management, Ltd.
Suite 400
7400 Metro Blvd.,
Minneapolis, MN 55435

Dear Mr. Perket:

I am writing in response to your March 9, 1981 letter to Mr. Jack Lehman asking for clarification of the hazardous waste regulations with respect to gray iron foundry waste.

Your first question, is it acceptable to test the combined sands and cupola drop as a single waste stream presents us with a problem. In the example cited, you indicated that the hazardous waste cupola material never really appears outside of a closed system except in admixture with the sand. Thus, one might think that the sand-cupola drop combination should be tested as one waste. However, in reality things may not be so easy. First, I am not sure that the sand and cupola residue actually become intimately mixed during the dropping operation. If I correctly understand the process you described, the sand just forms a base, similar to a charcoal grill firebase, for the cupola residue. Thus, the cupola residue actually does not become mixed with the sand unless and until it is mixed in the disposal site. If my understanding is correct, then the cupola residue should be evaluated separate from the waste sand if one is trying to determine if either is hazardous. Also, the six different sources of waste sand would also have to be evaluated separately.

If the cupola dust is found to be hazardous waste, but the mixed waste entering the disposal site is not, then the plant would only require a treatment permit since once the wastes are mixed together they cease to be hazardous waste. In order to obtain a treatment facility permit, the facility would have to meet the applicable Part 264 standards.

If a waste does not, at present, exhibit any of the

characteristics of a hazardous waste and that waste is subsequently listed as a hazardous waste, then in order to have the waste delisted the generator would have to demonstrate that it does not possess the property for which it was listed. This delisting would require the filing of a formal delisting petition (see §§260.20 and 260.22).

If a foundry applies for and receives a treatment facility permit for a waste, because the waste exhibits one or more characteristics, then that permit remains valid even if the waste subsequently becomes a listed hazardous waste.

I hope these answers serve to adequately clarify the regulations. If you need any additional information, please feel free to give me a call at 202-755-9187.

Sincerely,

David Friedman
Manager, Waste Analysis Program
Hazardous & Industrial Waste Division (WH-565)

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Minneapolis, MN 55435 Telephone 612-831-248?

March 9, 1981

Mr. John Lehman
Environmental Protection Agency WH565
401 M Street S.W.
Washington, D.C. 20460

Dear Mr. Lehman:

I am seeking clarification regarding the appropriate approach to testing wastes from one of our clients.

The client is a gray iron foundry which utilizes a cupola for melting its iron. The "cupola drop" after each charge has been designed to fall to the floor onto a bed of material comprised mostly of sands no longer useable for their original purpose in the foundry. These sands come from six different locations in the foundry.

The cupola drop temperatures are high enough to have an effect on the composition of the sands onto which they fall. For example, they could partly or completely oxidize phenolic substances in the sands. Visually, changes can be observed in the sand's colors after the cupola residue is dropped on them.

Our questions are as follows:

1. It can be documented that the procedure of dropping the cupola residue on the sands has been a long standing practice at this foundry. Is it acceptable to the Environmental Protection Agency to test the combined sands and cupola drop as a single waste stream? If not, what should be tested (i.e. all six sources)?
2. If the cupola dusts from this foundry are shown to be hazardous as a result of testing by the EP procedure, but a test of the composite of all waste is not, is this an adequate basis for proposing that the plant seek a permit as a treatment facility? If not, what additional test are required?

3. If the cupola dusts from this foundry are not found hazardous by the EP procedure (assume single test), will it be necessary to formally go through a delisting process if later this year the EPA lists foundry wastes from cupolas?
4. If the foundry obtains a license as a treatment facility before any action is taken on dusts relative to its listing, and subsequently cupola dusts are listed, what actions are needed to preserve the treatment permit?

Your prompt review of this matter is necessary to assist us in helping our client reach compliance within the earliest possible time frame. If we can be of assistance to you, please call me at 612-831-2480. We are requesting that a written response be sent to us for documentation. Thank you.

Sincerely,

Original Document signed

Cary Perket, P.E.

ENVIRONMENTAL ENGINEERING
& MANAGEMENT, LTD.

cc: Mr. Alan Corson
Mr. David Friedman