

PPC 9441.1984(12)

SPENT PICKLE LIQUOR, STATUS OF SUPERNATANT FROM LIME
NEUTRALIZATION

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Status of Supernatant from Lime Neutralization of Spent
Pickle Liquor

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This memorandum addresses your inquiry regarding the
status of supernatant from lime treatment of spent pickle
liquor.

First, you are correct in stating that the supernatant
is not included in the industry-wide exclusion of lime-
stabilized waste pickle liquor sludge (LSWPLS) (formerly
known as lime neutralized waste pickle liquor sludge)
generated from the iron and steel industry. The exclusion
pertains only to sludge generated from the treatment process.

Second, the supernatant is a hazardous waste. However,
it is not regulated when stored in a tank connected to the
wastewater treatment system. (This material is generally
stored in a sedimentation tank (clarifier) prior to discharge).
In addition, when discharged, the supernatant is excluded
from the presumption of being a solid waste, and thus, a
hazardous waste (see 40 CFR 261.4(a)(1)(ii)(2)), if it is
discharged either to navigable waters pursuant to the
provisions of the Clean Water Act or to a POTW. Supernatant
that is removed from the wastewater treatment system, and
is otherwise managed, is regulated under RCRA.

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