9441.1987(73)

SPENT ACIDS AS WATER CONDITIONER

8/31/87

MEMORANDUM

SUBJECT: Regulatory Status of Spent Acids Used as a Flocculant in Irrigation Water

FROM: Robert Scarberry, Acting Chief Waste Characterization Branch

TO: Bill Taylor, Chief Enforcement Section (6H-CE) Region VI

This is in response to your memo of August 14, 1987, requesting guidance on the regulatory status of spent acids used as a flucculant in irrigation water. Spent acids used in this manner are essentially a type of water conditioner, and as such, are not solid waste. (See 50 FR 619 and 628, January 4, 1985; and 48 FR 14485, April 4, 1983.)

If you have additional questions in this area, please contact Michael Petruska of my staff at FTS 475-6676.