May 14, 1985

Caroline Patrick Haight
Manager, Permit Review Branch
Division of Waste Management
Department for Environmental Protection
18 Reilly Road
Frankport; Kentucky 40601

Dear Ms. Haight:

Your letter to Mr. Matthew Straus regarding the clarification of the listing for a DuPont, Louisville, KY waste stream was referred to me for response.

DuPont's claim that their antimony pertachloride catalyst is liquid and anhydrous may, in fact, be true. However, this does not directly relate to the wastestream in question, K021. The wastestream of concern emanates from spent catalyst filter and contains washwater contaminated with spent catalyst and other organics that were carried along with the spent catalyst from the reactor. DuPont's analysis for the "reactor purge stream" is not an analysis of this wastestream, K021, and therefore, it contains no water. It appears to be an analysis of the spent catalyst before it is filtered, washed, and oxidized back to the pentachloride state.

DuPont may be accumulating the spent catalyst ("reactor purge stream") with the intent of future reclamation of metal values. This stream though, as described, is not K021. However, if they filter and wash the reactor purge stream, as shown in the process flow chart in the background document, they will generate K021, an aqueous waste containing Some spent catalyst and organics.

I hope this information clarifies the situation with this DuPont wastestream. If you have any further questions, please contact me or Mr. Ed Abrams of my staff at (202) 475-8551.

Sincerely yours,

Francine S. Jacoff
Manager Listing Program