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United States Environmental Protection Agency  
Washington, D.C. 20460  
Office of Solid Waste and Emergency Response

January 26, 1994

Donald D. Lain  
Department of the Navy  
Naval Air Warfare Center  
Aircraft Division  
Indianapolis, Indiana 46219-2189

Dear Mr. Lain,

This letter is in response to your November 15, 1993, letter requesting EPA to review the Navy's proposed procedure to decommission aluminum chaff roving bundles.

The reactivity characteristic includes solid waste which "forms potentially explosive mixtures with water", see 40 CFR 261.23(a)(3). Aluminum chaff roving bundles can release hydrogen gas when exposed to moisture. Hydrogen gas is flammable and therefore aluminum chaff roving bundles could carry the D003 wastecode, see §261.23(b). EPA has promulgated Land Disposal Restriction (LDR) rules requiring hazardous waste to be "treated" prior to land disposal. For the D003 wastecode, the treatment standard is a technology-based standard requiring "deactivation", see 40 CFR 268.42. Deactivation is the removal of the characteristic. Your Materials Lab Report (No. 24-92) indicates that an acidic solution accelerates the chemical reaction. Therefore, you should consider using an acidic solution to soak the chaffs in the demilitarization procedure. Using an acidic solution would provide a greater level of assurance that the reaction has gone to completion, as well as shorten the amount of time necessary for the reaction to go to completion.

Although, the Navy's proposed method of deactivation appears reasonable, the generators responsibility lies in "fully removing the hazardous characteristic" of D003 waste prior to land disposal. Even if the Navy chooses to incorporate EPA's comments, compliance with the regulations at §268.42 will be determined based on full

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and complete deactivation of any and all D003 waste, and not on following a specified method of deactivation.

We believe it is likely that other Divisions in the Department of Defense use aluminum chaff roving bundles. Our comments would be applicable to anyone disposing of this type of waste, and we hope that your Division shares this information with other Offices within the Department of Defense. If my office can be of any further assistance in this matter please contact William Morrow of my staff at 202-260-3657.

Sincerely,  
Michael H. Shapiro, Director  
Office of Solid Waste