

PPC 9432.1984(05)

TREATMENT AS DEFINED IN 40 CFR 260.10 SUBPART B

NOV 26 1984

MEMORANDUM

SUBJECT: Definition of Treatment; Application to
Great Lakes Carbon Corp.

FROM: John H. Skinner, Director
Office of Solid Waste (WH-562)

TO: James Scarbrough, Chief
Residuals Management Branch
EPA Region IV

We have reviewed and interpreted the definition of treatment as defined in 40 CFR 260.10, Subpart B - Definitions. The definition is made up of two parts: the change in the waste's character effected by treatment and the purpose of the change. Based on this definition, the process proposed by Great Lakes Carbon Corporation (GLCC) does not constitute treatment. GLCC's plan to add water to the cyanide contained in dissolvable plastic bags will change the physical character of the cyanide waste. However, the purpose of this change is to facilitate disposal. The change will not make the waste safer to dispose. None of those purposes listed in the definition, that is to neutralize; to recover energy or material resources; to render such waste non-hazardous or less hazardous safer to transport, store, or dispose; or amenable for recovery, amenable for storage, or reduced in volume, apply to the process proposed by GLCC.

If you have any questions, please contact Mr. Thomas Baugh of the Waste Treatment Branch at FTS 382-2550.

RO 12335