

9441.1987(39)

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAY 20 1987

Dr. Peter Russell
President
Russell Resources Inc.
25 Oak View Drive
San Rafael, CA 94903

Dear Dr. Russell:

I am responding to your letter of May 8, 1987, requesting the regulatory interpretation of used pickle liquor generated at the USS-POSCO Project in Pittsburg, CA. Specifically, you requested responses to three questions concerning the regulatory interpretation of the pickle liquor.

Your first question asks when the pickle liquor becomes a hazardous waste. The pickle liquor becomes EPA Hazardous Waste No. K062 as soon as it exits the pickling line baths and is sent to the regeneration operations; at this point it is considered to be a spent material (see 40 CFR 261.1(c)(1)). Thus, the spent pickle liquor is subject to the appropriate requirements in 40 CFR 261.6(b) and (c).

Your second question asks whether the regulatory interpretation for question 1 above is affected by the hydrochloric acid concentration in the waste. The answer to this question is no. Whether or not the pickle liquor can continue to be used does not affect the regulatory status of the pickle liquor at the subject facility; the fact that the pickle liquor is being regenerated (i.e., reclaimed) before reuse makes it a spent material. Therefore, pickle liquor is a spent material (cannot be reused without being regenerated) when it is taken from the pickling process for regeneration and its status would not change based on the concentration of the acid.

Your last question asks if the regulatory status of the spent pickle liquor is dependent upon whether it is used again in the same pickle line after on-site processing in a high temperature "reactor/separator" to remove iron as ferric oxide. Reuse on site after regeneration does not affect the regulatory status; however, reuse without the pickle liquor first being regenerated or use as an effective substitute for a commercial product would change the regulatory status because the spent pickle liquor would no longer be considered a solid waste (see 40 CFR 261.2(e)).

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If you have further questions, please call Ed Abrams at (202)
382-4787.

Sincerely,

Original Document signed

Matthew A. Straus
Chief, Waste Characterization Branch