

9441.1987(13)

BOUNDARY SANDS RECYCLED AND RETURNED TO THE BOUNDARY

MAR. 04, 1987

Mr. Michael Piznar
Neptune Water Meter Company
Route 229 South
Tallahassee, AL 36078-1799

Dear Mr. Piznar:

Thank you for your letter of January 19, 1987, confirming our telephone conversation. As I explained by telephone, EPA's hazardous waste regulations have special requirements for wastes that are recycled. You should review Part 261.2 and 261.6.

Based on the information you provided in our conversation the treatment process necessary to recycle your foundry sands back into your foundry would appear to be exempt from the need for a RCRA treatment permit. However, you should be aware that you will need to comply with the generator storage requirements if the wastes are stored in a tank or container for less than 90 days (40 CFR 262.34) or will need a storage permit if the wastes are stored on site for greater than 90 days. I am enclosing a copy of Parts 261.2, 261.6, 262.34 and the regulation for hazardous waste storage in tanks for your information.

Sincerely,

James R. Berlow, Chief
Treatment Technology Section
Office of Solid Waste

Enclosures

cc: Matthew Straus, Chief
Waste Characterization Branch

RO 12873