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MEMORANDUM

SUBJECT: Surface Impoundment at Al Tech's Watervliet
Facility

FROM: Alan S. Corson, Chief
Studies and Methods Branch (WH-562B)

TO: Richard M. Walka, Chief
Solid Waste Branch

In your letter of November 12, 1985, you requested our determination of the status of Al Tech's Watervliet, New York facility surface impoundment. You defined the surface impoundment as the receptor for leachate from an adjacent landfill. The leachate exhibits the characteristic of EP toxicity because it exceeds the RCRA regulatory threshold for chromium. (The characteristic is based on total chromium content: if the leachate exceeds the threshold on the basis of hexavalent chromium it must, of necessity, also fail for total chromium.)

Based on the information you provided it is clear that the leachate is a hazardous waste. Thus, the facility (the Al Tech impoundment) is a hazardous waste facility, subject to RCRA regulations. If you need additional information, I can be reached at FTS 382-4770.