

RCRA, SUPERFUND & EPCRA HOTLINE MONTHLY REPORT  
September 2000

**1. K069 Treatment Standard Subcategories**

*EPA establishes land disposal restrictions (LDR) treatment standards for hazardous wastes in 40 CFR §268.40. Because hazardous wastes within the same waste code can be highly variable, EPA developed treatment subcategories for many waste codes. K069, for example, is divided into low lead and high lead subcategories. Is there a specific lead concentration that distinguishes these low lead and high lead subcategories?*

There is not a specific concentration that distinguishes the low and high lead treatment subcategories for K069. Instead, the K069 calcium sulfate (low lead) subcategory and non-calcium sulfate (high lead) subcategory are delineated by the process generating the K069 emission control sludge. The calcium sulfate (low lead) subcategory includes only emission control sludges from secondary lead smelting that are generated as calcium sulfate from secondary wet scrubbers using lime neutralization. In contrast, the non-calcium sulfate (high lead) subcategory is defined as emission control sludges from secondary lead smelting that are not generated as calcium sulfate from secondary wet scrubbers using lime neutralization (53 FR 31138, 31165; August 17, 1988). Therefore, to determine the applicable LDR treatment subcategory for K069, a facility should examine the process that generated the waste.