

9551.1990(02)

LAB PACKS - LAND DISPOSAL RESTRICTIONS ASPECTS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

August 8, 1990

William J. Ziegler
Vice President of Health,
Safety and Environmental Affairs
ThermalKEM, Inc.
454 S. Anderson Rd.
BTC532
Rock Hill, SC 29730

Dear Mr. Ziegler:

This letter responds to your request of July 12, 1990, for clarification of the following aspects of the land disposal restrictions rule for lab packs as published on June 1, 1990 (55 Federal Register 22520):

- (1) EPA's Rationale for excluding EPA Hazardous Waste Codes P046, P111, and U163 from Appendix IV, and
- (2) whether §265.316(f) requires that fiber drums used for disposal of lab pack waste be overpacked in steel drums.

In response to your first question, EPA inadvertently excluded P046, P111, and U163 from Appendix IV. You are correct in stating that these wastes are incinerable and should be included in Appendix IV.

With respect to your second question, lab packs destined for incineration in fiber drums are not required to be placed in metal or steel containers. Paragraph (f) states that persons who incinerate lab packs prior to landfilling "may use fiber drums in place of metal outer containers" (emphasis added) ... However, fiber drums used in this manner must be overpacked with inside containers and absorbent material as described in §265.316(b). This provision does not require the use of metal shipping containers; however, it continues to require safe packaging and

management of lab pack waste.

I hope that this letter adequately address your concerns.
If you have additional questions, you may contact Rhonda Craig at
382-7926.

Sincerely,

Richard Kinch, Chief
Waste Treatment Branch