

9444.1987(34)

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

AUG 7 1987

MEMORANDUM

SUBJECT: Disposal of Wastes from the Environmental Chemistry  
Laboratory in Bay St. Louis, Mississippi

FROM: Marcia E. Williams, Director  
Office of Solid Waste (WH-562)

TO: Allen L. Jennings, Director  
Benefits and Use Division (TS-768-C)

This is in response to your July 1, 1987, memorandum in which you requested our reaction and guidance on your plans to dispose of wastes generated by the Office of Pesticide Program's Environmental Chemistry Laboratory (ECL), located in Bay St. Louis, Mississippi. ECL analyzes environmental samples for trace levels (ppm, ppb) of pesticides, herbicides, and related compounds, and ultra trace levels (ppt) of chlorinated dioxins. You presently have fifteen 35-gallon drums of miscellaneous laboratory wastes contaminated with low levels of dioxin and the equivalent of another seventy-five 35-gallon drums of environmental samples; these drums are currently being stored in freezers and other storage areas at ECL.

As a result of your July 24 meeting with my staff, it is my understanding that the wastes in question are not the listed dioxin-containing wastes under RCRA (40 CFR 261.31) and as such are not subject to the special management requirements for the listed dioxin wastes. These wastes, however, are likely to contain low levels of dioxins and as such should be managed with care. High temperature incineration is an appropriate means of disposal. We, therefore, encourage you to proceed with your proposal to send your laboratory wastes to ThermalKEM for incineration at their interim status fixed hearth, dual chamber, high temperature unit in Rock Hill, South Carolina.

If you have any further questions, please feel free to contact me.