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PARTICLE SIZE REDUCTION PROCEDURE FOR TCLP SAMPLES OF DRY CELL BATTERIES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Timothy J. Anderson
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Environmental Affairs
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Dear Mr. Anderson:

I am writing in response to your letter of May 15, 1991 concerning your particle size reduction procedure for TCLP sample preparation of dry cell batteries.

Your idea of using liquid nitrogen to freeze the samples before grinding is very interesting. Freezing at those temperatures would certainly tend to make the sample easier to crush afterwards.

However, the TCLP states that one must collect a representative sample of the waste as generated for analysis. We have no way of knowing whether this type of freezing will alter or affect the sample's physical or chemical composition (and therefore its leaching potential) in some way. Since the generator is ultimately responsible for making the determination that a representative sample is collected for analysis, we cannot make an up-front determination that this type of freezing is an acceptable step in crushing batteries.

If you have any further questions, please call me at (202) 475-6722.

Sincerely yours,

Gail Hansen
Health Scientist
Methods Section (OS-331)

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cc: Dave Bussard
Alec McBride
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Carrie Wehling, OGC
RCRA/Superfund Hotline
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