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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

JUL 13 1987

Mr. Wayne E. McCoy
Pfizer, Inc.
Minerals, Pigments and Metals Division
640 North 13th Street
Easton, PA 08042-1497

Dear Mr. McCoy:

This letter responds to a request from Pfizer to provide an interpretation on the regulatory status of the lime-ammonia stabilized iron oxide sludge that is generated at Pfizer's Valparaiso, Indiana facility. In particular, it was asked whether this sludge is exempted from the hazardous waste regulations under 40 CFR 261.3(c)(2)(ii) (i.e., exemption for lime-stabilized waste pickle liquor sludge). Based on my understanding of the process, spent pickle liquor (K062) is the only waste that is received at the Valparaiso facility; in the course of recycling the spent pickle liquor^{1/}, solids are generated which are treated with ammonia and lime to produce a stabilized sludge. Under this set of conditions, the iron oxide sludge that Pfizer generates at its Valparaiso plant is covered under the lime-stabilized waste pickle liquor sludge examination. Thus, I agree with the State of Indiana in their interpretation of the hazardous waste rules. However, you should be aware that this waste may still be hazardous if it exhibits any of the hazardous waste characteristics, and Pfizer is still responsible for making this determination.

Please feel free to give me a call at (202) 475-8551 if you have any further questions.

- 1/ The spent pickle liquor is first neutralized with scrap iron. Waste from the liquor consists of tramp dirt and foreign materials from the scrap iron and the steel mill liquor. The liquor is clarified prior to using for iron oxide manufacturing by setting out the solids. The solids are then treated to generate the lime-ammonia stabilized iron oxide sludge.

Sincerely,

Original Document signed

Matthew A. Straus
Waste Characterization Branch