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MEMORANDUM

SUBJECT: RCRA Status of Surface Impoundments at Rockwell International, Ashtabula Plant

FROM: Marcia E. Williams, Director
Office of Solid Waste

TO: Judy Kertcher, Acting Chief
Solid Waste Branch (5HS-13)
Region V

This memorandum is in response to your August 6, 1987 inquiry, and subsequent communications between France Norling and the Characteristics Section staff, regarding the RCRA status of the surface impoundments at Rockwell International's Ashtabula plant. Specifically, you requested assistance in determining whether the wastes managed in the impoundments exhibit the hazardous waste characteristic of reactivity.

As you are aware, the reactivity characteristic promulgated in the regulations is a narrative definition. In particular, the regulations define a sulfide bearing waste as reactive when it is exposed to pH conditions between 2 and 12.5 and can generate exotic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment. To assist the Regions and the regulated community in interpreting this rule, the Characterization and Assessment Division provided interim guidance which indicated that wastes releasing more than 500 mg H2S/Kg waste should be considered hazardous (see enclosure). In addition to the level, a testing method was also provided. We are evaluating the reactivity of the waste in question based on this interim guidance. However, you should note that any final decision as to the hazardousness of the waste (i.e., reactivity) must be based on the regulation. See 40 CFR 261.23.

Based upon the analytical data provided by Region V, the average concentration of sulfide in all the lagoons is below our guidance level of 500 mg/kg; therefore, the wastes are likely not reactive under the hazardous waste rules. The upper bound of the 90% confidence limit, however, is above the guidance level for two of the lagoons in question (lagoons 1 and 3). This suggests that the true concentration of the waste in the impoundments might be above the guidance level. Therefore, before a definitive decision can be made on the true concentration of sulfide in the sludge in lagoons 1 and 3, additional sampling and analysis is recommended.

Should you, or Rockwell, require assistance related to the analytical methods or sample handling procedures, please contact Gail Hansen of the Methods Section at FTS 475-6722. Questions regarding the reacti- vity characteristic in general and its applicability should be directed to David Topping of the Characteristics Section at FTS 382-4798.

Enclosures

cc: Gail Hansen
David Topping