

PPC 9433.1991(02)

SPENT PICKLE LIQUOR DELISTING PETITION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

April 26, 1991

Mr. Lloyd Williams  
Plant Engineer  
Davis Pipe and Metal Fabricators, Inc.  
Birch Street  
Blountville, Tennessee 37617

Dear Mr. Williams:

I am writing in regards to your delisting petition (#0758), which requests the exclusion of the liquid phase obtained from the lime neutralization of spent pickle liquor and associated rinse waters generated at Davis Pipe and Metal Fabricators, Inc's (Davis Pipe) Blountville, Tennessee plant. This waste is currently classified as EPA Hazardous Waste No. K062.

On February 26, 1991, I was contacted by Davis Pipe's attorney, Ms. Gladys Smith of Caldwell, Heggie & Helton. Ms. Smith requested that we postpone any decision regarding your petition until after Davis Pipe had collected and analyzed weekly samples generated over a six- to eight-month period. In light of our concerns regarding the apparent variability in both the total concentrations of chromium and nickel and the volume of waste generated annually, we agree that it would be useful for Davis Pipe to collect additional data. We also believe that representative weekly samples collected over the course of six to eight months (roughly 26 to 35 weekly samples) will allow us to characterize completely any variations in total concentrations of chromium and nickel. Therefore, we have decided to give Davis Pipe an additional six months to fully respond to our previous request for analytical data representative of the petitioned waste.

During this six-month period, we expect Davis Pipe to collect samples of the waste on an as-generated basis and to produce weekly composite samples representative of all the waste generated during that particular week. Each weekly composite sample should be analyzed for pH and the total concentrations of all the Toxicity Characteristic (TC) metals, nickel, and cyanide. Davis Pipe also should:

- Demonstrate that the waste does not contain any of the TC organics by analyzing a minimum of four weekly composite samples for the total concentrations of all the TC organics. See 40 CFR §261.24 for a list of the organic analytes. Note that delisting levels may be somewhat lower than TC levels. Therefore, we require detection levels to be well below TC levels. (We suggest that your laboratory reach the PQLs for a water matrix as defined in SW-846.)
- Record the volume of wastewater generated and update (finalize) its estimate of the maximum annual generation rate. Note that, if delisting is granted, the waste volume excluded will be specified in the regulatory language.
- Provide a detailed description of the sampling strategy and explain why you believe the collected samples adequately capture the waste stream's variability.
- Provide the professional qualifications (e.g. a brief resume) for all new personnel (if any) involved in the planning and execution of the sampling and analysis plan.
- Document the analytical methods and equipment used, the sample collection and analyses dates, and the sample weights.
- Provide analysis with appropriate detection limits, and include all of the quality control (QC) information associated with the analytical procedures conducted. This should include information on method blanks, matrix spikes and matrix spike duplicates, and standard additions curves. Information on appropriate QC procedures can be found in Chapter one of SW-846 (third edition). Quantification limits (PQLs) for an aqueous matrix are given in the appropriate chapter for the individual method.
- Provide schematic diagrams documenting any changes made to the wastewater treatment system, treated wastewater storage system, and waste management practices, and fully discuss such changes.

In order for us to complete our evaluation of your petition in a timely manner, you must fully respond to this request for additional information within six months of the date of receipt of today's correspondence. If we do not receive a complete response from you within six months, in accordance with EPA policy, we will dismiss your petition from the petition review process (see 53 FR 6822, March 3, 1988). In that case, we will notify you of dismissal by letter.

Please note that it is to your advantage to submit the requested information before the six months expire, so that any remaining deficiencies identified by the Agency subsequent to your submittal can be remedied within the six month time frame.

If you do not believe that you can fully respond within six months, you may wish to withdraw your petition now and submit a complete new petition later at your convenience. If you prefer this option, you must send a letter to EPA withdrawing your petition and indicating that the petitioned waste is considered hazardous and will be managed as such. This letter should be forwarded to:

Jim Kent  
U.S. Environmental Protection Agency  
Office of Solid Waste  
Mail Code OS-333  
401 M Street, S.W.  
Washington, D.C. 20460

Should you have any questions regarding the information requested in this correspondence, please contact either Narendra Chaudhari, of my staff at (202) 382-4787, or Howard Finkel, of ICF Incorporated, at (703) 934-3656.

Sincerely,

Robert Kayser, Chief  
Delisting Section

cc: Doug McCurry, Region IV  
James Scarbrough, Region IV

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Narendra Chaudhari, EPA HQ  
Jim Kent, EPA HQ  
Howard Finkel, ICF Incorporated  
Gladys F. Smith, Caldwell, Heggie & Helton