9433.1986(07)

DELISTING PETITION - STEEL FACILITY, REQUIREMENTS FOR CLOSURE PLAN

MAR 18, 1986

Mr. Ronald Shiver
Staff Engineer
K.W. Brown & Associates, Inc.
6A Graham Rd.
College Station, TX 77840

Dear Mr. Shiver:

I have reviewed the ground water monitoring data you submitted on behalf of Falcon Steel, Kaufman, Texas. The increase in conductivity is not, in itself, sufficient reason to deny a delisting petition. Unfortunately, data for the remainder of the EP toxic metals and nickel (in addition to lead and chromium) were not included in the 1984 and 1985 monitoring reports; ground water data for these constituents is also necessary to insure that no contamination has occurred. As a result of the Hazardous and Solid Waste Amendments of 1984, we are required to consider all factors (including additional constituents) when evaluating delisting petitions, if these factors may reasonably cause the waste to be hazardous. (The EP toxic metals, nickel, and cyanide are reasonably expected to be present in the waste as a result of the operations performed at the facility, i.e., the tanks and steel involved).

I also, once again, reviewed the closure plan submitted in February, 1985. I want to clarify what will be required in order to submit a complete delisting petition. The following information will be needed:

1) all information under 40 CFR 260.22(b) and (i) (1-120);

2) a detailed list, description and schematic of all manufacturing processes, including surface and equipment preparation, cleaning and/or degreasing, coating or painting processes, which may have contributed waste, wastewater, painting or rinse water to the

waste petitioned for exclusion;

3) a complete list of all raw materials used, including chemical compositions, and material safety data sheets, if available, identifying all solvents, acids, cleaners, surface preparation agents, paints, etc., used in the manufacturing process which may have entered the waste petitioned for delisting;

4) an explicit statement verifying that the number of samples collected and analyzed is representative of any variation in constituent concentrations, and the basis for such a conclusion;

5) a detailed description of the sampling methodology and analysis methods used on the representative waste samples;

6) data indicating that representative samples were tested for the ignitable, reactive, and corrosive characteristics outlined in Subpart C §261.21-13.

The following testing requirements must be performed on samples collected from each impoundment. The impoundments should be divided into quadrants; at least four core samples should be collected in each quadrant and composited (at least four composites are needed from each impoundment).

7) total constituent analyses of the waste (complete acid digestion) for each of the EP toxic metals, and nickel on a representative number of samples (but not less than four);

8) total analysis for cyanide on a representative number of samples (but not less than four); if the cyanide concentration exceeds 1 ppm, then tests should be run for free cyanide on representative samples;

9) an EP leachate analysis */ of the waste for each of the EP toxic metals nickel, and cyanide (using distilled water for the CN analyses) on a representative number of samples (but not less than four);

10) a determination of the total oil and grease content of

the waste be testing a representative number of samples (but not less than four) using the enclosed method;

11) amount of waste present in each impoundment after neutralization;

12) describe quality assurance procedures followed during sampling and analysis. For example, results from the method of standard additions for the EP toxicity tests should be included.

*/ If the oil and grease level of the waste exceeds one percent, the EP for oily waste metholology should be followed during analysis.

If after reviewing the data specified above, the Agency finds that organic toxic constituents or other toxic metals are used in the facilities manufacturing processes, you may be required to submit representative test data quantifying these constituents in the waste.

If you have any questions about these information requests, please call me at (202) 382-4519. In addition, the final guidance manual is available through NTIS if you have not already acquired it.

Sincerely,

Ann Burke Sarno
Environmental Protection Specialist
Waste Identification Branch (WH-562B)