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Suellen Pirages, Ph.D.
Director, Institute of Chemical
Waste Management
National Solid Wastes Management
Association
1730 Rhode Island Avenue, N.W.
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Washington, D.C. 20036

Dear Dr. Pirages:

Thank you for your letter of October 26, 1987, expressing the Institute of Chemical Waste Management's (ICWM) concerns on various issues.

The Environmental Protection Agency (EPA) shares your concerns regarding the performance guidlines of 50 psi compressive strength for wastes subject to liquid absorption/ adsorption treatment. We intend to provide additional guidance to the Regions and States in the near future. This guidance will emphasize that we are not recommending that a specific compressive strength be incorporated into permits. The guidance will, at a minimum, deemphasize the importance of a specific level (such as 50 psi) and stress that the important criterion is that following treatment, compressive strength must increase over time.

Therefore, if an owner/operator shows an increase in compressive strength over time, then it can be concluded that the treatment process is indeed achieving stabilization/ solidification for that waste, and is not merely an absorption/adsorption process.

You also raise the issue of the tendency on the part of permit writers to allow facilities to use only SW-846 methods when testing wastes. While the regulations do not require the use of SW-846 methods, the permit writers may be requiring facilities to use them because these methods have been evaluated by EPA and found to be suitable for their intended purposes. Before a permit writer can allow a facility to use a non-SW-846 method, he/she must be convinced that the method works, and would probably require that the applicant first submit data which demonstrate the method's validity in the intended application. Therefore, I do not believe that sending a reminder to permit writers would address the problem.

We are trying to include in SW-846 the least costly methods that can adequately answer the testing questions that facility owners/operators need to answer. It is our aim to continue to expand the list of approved methods as expeditiously as possible. To this end, EPA has been soliciting from industry, and other members of the regulated community, suggestions on methods to include in SW-846. I suggest that ICWM submit to EPA any fingerprinting or other cost-effective testing methods that have been evaluated by ICWM. Once EPA has reviewed the method and its supporting data and determined that it is suitable for RCRA use, EPA will add the method(s) to SW-846. Enclosed is a copy of the Test Methods Equivalency Guidance Manual which describes the information EPA requires and the procedures.

EPA is currently considering alternative systems to use in coding hazardous wastes. Among the alternatives being evaluated are systems that more accurately describe the type of waste being characterized (e.g., incinerator ash, scrubber water, etc.). The Agency is also considering a feature by which the code would reflect the treatment requirements to which the waste must be subjected prior to disposal. This project is still in its early, conceptual stage. Finally, as to the proper characterization of mixture derived from wastes according to the current system, EPA requests that all of the waste codes (from which the new material is derived) be used.

If I can be of any further assistance, please let me know.

Sincerely,

Original Document signed

J. Winston Porter
Assistant Administrator

Enclosure

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