

PPC 9554.1992(02)

DETERMINATION OF EQUIVALENT TREATMENT FOR METAL RECOVERY

United States Environmental Protection Agency  
Washington, D.C. 20460  
Office of Solid Waste and Emergency Response

December 4, 1992

Mr. Charles W. Grant  
Environmental Compliance Manager  
Chemical Waste Management, Inc.  
P.O. Box 2563  
Port Arthur, Texas 77643

Dear Mr. Grant:

EPA has reviewed your request for a "determination of equivalent treatment" as authorized by 40 CFR 268.42(b) for 17 "third third" waste codes for which metal recovery was specified as BDAT. Based on the information provided in your letters dated August 31 and October 7 and the conversations between you and my staff, we have determined that the proposed treatment of incineration followed by treatment of the ash to comply with the metal treatment standards (as specified in the Enclosure), would provide equivalent treatment to that of the promulgated standard for thirteen waste codes present in your waste streams (K069 - lead, K106 - mercury, P015 - beryllium, P065 - mercury, P087 - osmium tetroxide, P092 - mercury, P113 - thallic oxide, P115 - thallium (I) sulfate, U151 - mercury, U214 - thallium (I) acetate, U214 - thallium (I) carbonate, U216 thallium (I) chloride, and U217 - thallium (I) nitrate). The other waste codes specified in your request letter currently allow incineration, stabilization, or other applicable technologies to be used to achieve the treatment standard. As such, a determination of equivalent treatment is not needed for those wastes.

Enclosed you will find our determination on your request. If you need further assistance, please contact Richard Kinch, Chief, Waste Treatment Branch (703 308-8434).

Sincerely,  
Sylvia K. Lowrance, Director

RO 13581

Office of Solid Waste

Enclosure

cc: Jim Thompson, OWPE; Nick Stone, Region 6