

PPC 9433.1984(03)

SPENT PICKLE LIQUOR GENERATED FROM PORCELAIN ENAMEL
INDUSTRY, DELISTING OF

10-23-84

Mr. John C. Oliver
Porcelain Enamel Institute, Inc.
1911 North Fort Myer Drive
Arlington, Virginia 22209

Dear John:

As we have discussed previously, the Agency considers its July 27 interpretation (see enclosure) of the spent pickle liquor listing to be the correct reading of the hazardous waste regulations. Therefore, the spent pickle liquor (as well as any sludge generated from the treatment of the spent pickle liquor) that is generated from the procelain enamel industry is considered to be a listed hazardous waste--namely, EPA Hazardous Waste No. K062. In order for the industry to change the regulatory status of this waste, they will need to submit an industry-wide rulemaking petition.^{1/} At your request, we have made a preliminary assessment of the number of plants to be sampled and the specific toxicants that would need to be evaluated to support an industry-wide exclusion petition for the Procelain Enameling Category. In addition, the petition should address the requirements cited in 40 CFR §260.20. We would not view an industry-wide petition as applying to plants that are integrated with electroplating operations and generating wastes covered by the F006-F009 listings. Wastes of this type would have to be evaluated independently.

We estimate that in order to obtain a 95% degree of confidence that you have a representative sample of the industry you will need to sample 20 integrated and 5 non-integrated facilities. (If most integrated procelain enameling plants are integrated with electroplating operations under the circumstances described above, then we would accept sample from a lesser number of integrated facilities, since

1/ Of course, any person may submit a site-specific delisting petition pursuant to 40 CFR §§260.20 and 260.22. the petition would not be addressing porcelain enamel plants that are integrated with electroplating operations.) These figures were determined using an approximate sampling rule developed by OSHA. This type of sampling approach has been successfully used in the past by the Institute for Scrap Iron and Steel in a similar study for EPA. The actual number of samples which should be analyzed cannot be identified as precisely. However, a sufficient number of samples should be taken from each facility which would represent the variable nature of the waste. In this regard, composited samples representing any variability in raw materials or process would be the best approach in minimizing the overall analytical burden.

Sample analysis should include determination of a limited number of both inorganic and organic constituents and tests for the four hazardous waste characteristics (i.e., ignitability; corrosivity, reactivity, and Extraction Procedure (EP) toxicity). The specific constituents that should be analyzed for in the wastes are as follows:

Category	Constituent 2/
Inorganic	Chromium
	Lead
	Nickel
	Cadmium
	Selenium
Category	Constituent
Organic	Carbon tetrachloride
	Chlorethane
	Chloroform
	Chloromethane
	1-dichloroethylene
	trans 1,2-dichloroethylene
	Dichloromethane
	1.2-dichloropropane
	1.3-dichloropropylene
Tetra chloroehtanes	

Tetrachloroethylene

2/ The metals should be analyzed using the Extraction Procedure (EP) toxicity test and for their total metal content.

Trichloropropane
Methyl ethyl ketone
Methyl isobutyl ketone
Benzene
Ethyl Benzene
Toluene
Xylenes

The organic constituents were selected due to the likelihood that both halogenated and non-halogenated solvents are used at integrated facilities, and that these facilities are going painting operations. However, if you have information which would indicate that some of these toxicants are not expected to be in the waste from integrated facilities, we will consider this information to determine whether analysis for these contaminants is necessary. We will require that all these contaminants (i.e., organic and inorganic toxicants) be analyzed for at the 20 integrated facilities; however, since the non-integrated facilities are not expected to contain significant levels of organics, we will only require that two of the five non-integrated facilities be analyzed for the organics. All five non-integrated facilities should be analyzed for the inorganic contaminants. Test methods for these constituents are provided in the Methods Manual "Test Methods for Evaluating Solid Waste " SW-846.

We believe it is in the industry's best interest to proceed with a delisting, whether or not it pursues the pending litigation. EPA will expedite processing of the petition no matter how the litigation is proceeding. If you decide to move forward with an industry-wide petition and need specific information on sampling and analysis methods, please call Jim Poppiti at (202) 382-4690.

Sincerely,

Matthew Straus, Chief
Waste Identification Branch

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