

9441.1987(08)

January 28, 1987

Mr. David M. Friedman  
Environmental Chemist  
Bureau of Waste Management  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
P.O. Box 2063  
Harrisburg, PA 17120

Dear Dave:

This is in response to your letter of October 21, 1986, regarding the scope of the final rule exempting lime-stabilized waste liquor sludge (LSWPLS) from the presumption of hazardousness in 40 CFR 261.3. As we discussed on the telephone, the exemption applies to LSWPLS generated by plants in the iron and steel industry (Standard Industrial Classification (SIC) Codes 331 and 332), whether or not the spent pickle liquor has been mixed with other non-listed process wastes generated by the iron and steel industry.<sup>1/</sup> In reaching this conclusion, the Agency evaluated both the residue generated by the lime-stabilization of spent pickle liquor as well as the lime-stabilization of spent pickle liquor that has been mixed with other process wastes generated by the iron and steel industry. In both instances, we determined that the LSWPLS was not hazardous after considering the original basis for the listing (i.e., corrosivity and the presence of lead and hexavalent chromium) as well as considering other toxicants that may reasonably be expected to present in the waste. Thus, the LSWPLS generated by Bethlehem Wire Rope at their facility in Williamsport, Pennsylvania is covered by the exemption in 40 CFR 261.3(c)(2)(ii).

Please feel free to give me a call at (202) 475-8551 if you have any questions.

1/ As you are aware, LSWPLS would be considered hazardous if it exhibits one or more of the hazardous waste characteristics (i.e., ignitability, corrosivity, reactivity, or extraction procedures (EP) toxicity).

Sincerely,

Original Document signed

Matthew A. Straus, Branch Chief  
Waste Characterization Branch

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