

PPC 9487.1986(12)

CONTAINERIZED AND BULK HAZARDOUS
LIQUIDS IN RCRA LANDFILLS

DEC 30 1986

Mr. Jim Gilbert
Office of Commodity Management
General Services Administration
Federal Supply Service
Washington, D.C. 20406

Dear Mr. Gilbert:

This is in reference to our telephone conversation on December 23, 1986, concerning a GSA letter addressed to a Mr. Michael A. Taylor of Andesite of California, Inc. (Enclosure A). I would like to summarize our conversation for the record.

We discussed a statement extracted from another letter (unavailable to EPA) written to GSA by an Army lab in Natick, MA: "The only commercial product which meets the EPA's criteria for adsorption is 'Safestep,' an absorbent/anti-slip compound manufactured by Andesite of California, Inc., Los Angeles, California." This statement is incorrect.

The EPA has no criteria for absorbents such as those alleged by the statement. In the regulatory language of 40 CFR Parts 264 and 265 (Section 264.314 and 265.314), which governs the disposal of both bulk (non-containerized) and containerized liquids, the Agency allows any absorbent material to be used as a treatment method for containerized hazardous liquids, and does not allow any ab- or adsorbent material to be used as the sole method of treatment for bulk liquids.

The rent regulations for the disposal of containerized hazardous liquids specify that an absorbent used in a container must remove free-standing liquids (Enclosure B). The Agency has proposed a regulatory change that will require the use of non-biodegradable absorbents for the treatment of containerized liquids. The proposal (Enclosed C) will also require

that the non-biodegradable absorbent/waste mixture not release liquids under pressure. Until this proposal is finalized and becomes effective, any absorbent is still allowed to be used to comply with the current regulations for containerized liquids, although we have recommended on various occasions that non-biodegradable types be used; therefore, Mr. Taylor's product, "Safestep," is not the only material that may be used to treat containerized liquids.

In response to Section 3004(c)(1) of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA), which prohibits "the placement of bulk or noncontainerized liquid hazardous waste or free liquids contained in hazardous waste (whether or not absorbents have been added) in any landfill," the Agency developed a guidance document to support the statutory language. The Agency issued a notice of availability for the guidance document, which discusses the use of ab- or absorbents for the treatment and disposal of bulk liquids (Enclosure D). In this document, the Agency states that both absorption and adsorption are reversible processes and can release the sorbed liquid back into the landfill; therefore, the Agency has interpreted the statutory language defining such bulk liquids to include materials that sorb wastes through either ab- or adsorpties. Clearly, the use of ab- or adsorbents as a sole treatment method for bulk liquids is not allowed, thus rendering inaccurate the claim made in the above statement to Mr. Taylor.

In summary, the claim that Mr. Taylor's product, "'Safetep,' is the only commercial product which meets EPA's criteria for adsorption" is completely incorrect. If you should have any further questions, please call me at (202) 382-4682.

Yours truly,

Paul F. Cassidy
Environmental Engineer

Enclosure

cc: Marilyn M. Campbell
Irv Ostriot, GSA
James Malcolm, EPA
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