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RCRA/SUPERFUND HOTLINE MONTHLY REPORT

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LISTING OF BAGHOUSE DUST GENERATED FROM REMELTING
OF PRIMARY PRODUCTION STEEL

1. A facility generates a baghouse dust from remelting primary produced steel. The remelting occurs in electric furnaces. The baghouse dust contains fluoride neutralized by calcium carbonate and the heavy metals: lead and selenium. The baghouse dust has been analyzed for the heavy metals (50.65ppm lead and 13ppm selenium). The analytical methods used were 8.56 and 8.59, respectively, in SW-846 (not the E.P. toxicity test). Assuming that the baghouse dust will fail the EP toxicity test, should the waste be K061 (even though it is not primary smelting) or should it be D008 and D010?

The waste generated from this process is K061. Although steel is being remelted, this process is considered primary production for the purposes of RCRA.

Source: Matt Straus
Research: Gordon Davidson