

ST. JOE LEAD COMPANY
Smelting Division
Herculaneum, Missouri 63048

To: D. H. Beilstein

Dated: March 7, 1979

From: D. H. DeClue

Subject: AMC Hazardous Waste Meeting

The meeting was convened at 1:05 p.m. in the Heather Room, Holiday Inn - Airport, 4040 Quebec, Denver, Colorado. Norman Kesten of Asarco, Incorporated was Chairman and he asked for everyone present to identify themselves. The AMC memorandum dated 22 February 1979 was used as the agenda for the meeting. John Kennedy and Mike Reilly were also present from St. Joe.

The EPA definition of a mine will be used as the AMC proposed definition of mine site. The change of definition would help zinc and lead mining. The five times drinking water standards for determining toxicity in Section 250.13(d)(1) drew a great deal of discussion. ASTM final procedures would be the best approach for AMC. The final procedure was not available by the time of this meeting. The toxicity tests should also be site specific and not a nationwide generalization as currently stated. The extraction procedure Section 250.13(d) (2) should also be site specific not generalized. Every waste that you generate should be tested to determine toxicity per current EPA hazardous waste guidelines. AMC will try to get the use of waste oil on roads for dust control incorporated in the final hazardous waste regulations. Several people commented that EPA assumes mismanagement of hazardous waste by industry. The regulations require that EPA substantiate mismanagement and give industry 30 days to correct the problem if one is found. However, state regulations could vary on this point when they are promulgated.

The PEDCO report on waste materials contracted by EPA has been completed. Copies are available from AMC headquarters at \$15 per copy. Lead smelting information should be included in the report.

All hazardous waste must be out of the 500-year flood plain. AMC said the best they could do was ask for a 200-year predicted maximum requirement. Since some of our materials were underwater in the great flood, this 200-year maximum flood plain could present problems let alone the flood stage of the Mississippi River for a 500-year predicted flood. Mike Reilly plans to address the possible problem of flooding in his testimony. The meeting agenda was completed on time at 5:00 p.m., Denver time.

DHD/cds

cc: R. E. Peppers


Environmental Officer