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J.R. Shaw

CONTAMINATED INDUSTRIAL DEBRIS

This will summarize the Code of Federal Regulations on the Standards Applicable To Generators of Hazardous Waste. Specifically these are the requirements for safely managing and accumulating **contaminated industrial debris**, i.e. used gloves, clothing, filters, etc., prior to shipment for treatment or disposal off-site:

- 1 Contaminated industrial debris is a **hazardous waste** because it fails the TCLP test for arsenic, cadmium, chromium and lead.
- 2 It may be accumulated in a **satellite accumulation area** which can be defined as:
Place where wastes initially accumulate near the point of generation and is under the control of the operator (operating areas) prior to movement to the **90-day accumulation area**.
- 3 Containers used in satellite areas must be:
in good condition
compatible with waste
closed when not being filled
handled safely so as not to leak
labeled "Hazardous Waste" or "Contaminated Industrial Debris"
dated when volume of 55 gallons is reached
transferred to 90-day accumulation area within three days of being dated
- 4 The definition of a **90-day Accumulation Area** is:
Place where wastes are stockpiled for 90 days or less while awaiting shipment off-site for treatment and/or disposal
- 5 The 90 day accumulation period begins with the date on the first drum of waste placed in the 90-day accumulation area.. This date is the **accumulation start date**. Wastes must be **shipped off-site in 90 days** or less from the accumulation start date.

6. **Each container placed in the accumulation area must be :**
 - in good condition**
 - compatible with waste**
 - covered**
 - handled safely so as not to leak**
 - labeled " hazardous waste "**
 - dated with the " accumulation start date "**
 - transferred off-site within 90-days**
7. The regulations call for generators of hazardous waste to have the following plans and procedures in place:
 - personnel training** (Subpart B of 40 CFR 265, Para. 265.16)
 - preparedness and prevention plan** (Subpart C of 40 CFR 265)
 - contingency plan** (Subpart D of 40 CFR 265)
 - emergency procedures** (Subpart D of 40 CFR 265)
8. The regulations do not specifically address requirements for accumulation areas other than to say that the waste is placed in:
 - containers and the generator complies with Subpart I of 40 CFR part 265 (management of containers)**

Currently all trash is collected in trash barrels and dumpsters. These are periodically emptied and the collected trash is taken to the construction lot behind the SW Lab where it is dumped and sorted. The trash that is known to be hazardous is separated out and taken to the 90-day accumulation area where it is stored in bulk in a three sided concrete bunker which also has a roof overhead.

Asarco's " **90-day accumulation area** " currently does not utilize **covered containers** as required by the regulations.

It would probably be best if we had covered roll-off boxes around the plant to collect this waste directly. Before 90 days elapse, each container would have to be sent off site for disposal. Some containers may be emptied more often than others.

At a minimum, it should have the following:

- sign indicating "**hazardous waste accumulation area**"

- prevent run-on

- protect from weather-(install plastic tarp)

- remove spills or precipitation

- weekly inspections and document results:

 - check corrosion and leakage

 - check labeling

 - check accumulation start dates to be sure all wastes are shipped off-site before 90-day period expires

 - note all corrective action taken on the inspection form