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Lead Industries Association, Inc.

292 Madison Avenue • New York, N. Y. 10017 • Telephone: (212) 532-2373

Environmental Health Department

June 19, 1979

TO: All Official Members of the Lead Industries Association, Inc.
All Members of the LIA Environmental Health Committee

FROM: Jerome F. Cole, Sc.D.

Enclosed is a letter from Dr. M. Ghassemi of TRW requesting information on solid waste generated by secondary zinc smelting and secondary lead smelting operations. The use to be put of this information is explained in his letter.

Please note that the key question is whether or not the amount of 100 kilograms of hazardous waste is a realistic cut-off differentiating small volume hazardous waste generators from large volume generators.

The information requested may be sent directly to TRW or, if you wish, we will be pleased to submit it to TRW for you. This latter option may be exercised particularly if you wish to remain anonymous.

Sincerely,

Jerome F. Cole, Sc.D.
Director, Environmental Health

Enclosure

Dictated but not read

LIAC345F

TRW

12 June 1979

JUN 18 1979

Mr. Jerry Cole
Director of Environmental Health
International Lead Zinc Research Organization
292 Madison Avenue
New York, New York 10017

Dear Mr. Marshall:

This is with reference to the telephone conversation of Mr. Rob Scofield of our staff with you on 1 June 1979, requesting information for use in our hazardous waste management study for the U.S. Environmental Protection Agency (EPA).

Under contract No. 68-02-2613, Work Assignment No. 27, TRW is assisting the EPA's Office of Solid Waste in developing the technical data base for establishing regulations governing the "small volume" hazardous waste generators. The establishment of hazardous waste management regulations is pursuant to the provisions of Subtitle C of the Resource Conservation and Recovery Act (RCRA). Section 3002 of the Act requires the EPA Administrator to promulgate regulations establishing standards for persons generating wastes identified or listed as hazardous. The regulations would establish certain requirements for record keeping and reporting by the waste generators. EPA has proposed, but not yet promulgated, regulations governing waste generators; these proposed regulations appear in the Federal Register (December 18, 1978 issue).

As currently proposed, persons who produce and dispose of less than 100 kilograms (approximately 220 pounds) of hazardous waste in any one month would be considered small volume hazardous waste generators and exempted from certain reporting and record keeping requirements, provided that the waste is disposed of in an approved waste disposal facility. The proposed 100 kilograms per month "cut-off" level has been developed based on limited survey data indicating that this cut-off point should allow control of a significantly high percentage of potentially hazardous industrial waste while at the same time excluding a very high number of facilities generating relatively small quantities of hazardous waste. The proposed 100 kilograms per month cut-off level has been the subject of some controversy with suggestions for modifications ranging from raising, lowering or eliminating the cut-off point to making the cut-off point dependent on the degree of hazard presented by a waste.

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Mr. Jerry Cole
International Lead Zinc Research Org.
12 June 1979
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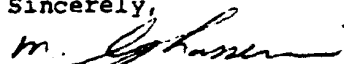
The overall objective of the TRW study is to evaluate the environmental impacts which would be associated with the implementation of any of the various options for regulating "small" volume hazardous waste generators. As a first step in our study we are collecting and evaluating the background data on "small volume" waste generators. For the secondary zinc smelting (SIC 33414) and the secondary lead smelting (SIC 33413) we are specifically interested in the following information, some of which we hope you would be able to provide to us:

- The amount of solid waste generated by each plant (e.g., slag, scrubber sludge, baghouse dusts, contaminated scrap, etc.). If this information is not available, perhaps you could provide your estimate of a waste generation rate (e.g., kg of solid waste per ton of product or per employee) and plant size data (e.g., monthly tons of product or number of employees).
- The disposal practices for each waste stream, the number of plants disposing of their solid wastes by each method and the quantity of waste handled by each method (e.g., for scrubber sludges: number of plants employing waste recycling and the quantity of waste recycled; number of plants sending them to landfills and the quantity of wastes disposed of in landfills).
- Any information on the potential hazards associated with various solid wastes. We would be especially interested in the results of any extraction tests (e.g., the extraction procedure outlined in the December 18, 1978 Federal Register) performed on scrubber sludges, baghouse dusts, slags, etc.
- The unit cost of disposal for each final disposal method (e.g., dollars/ton for landfill disposal).
- Industry structure data (i.e., the total number of establishments in each SIC in the U.S. and their geographic distribution).

We are not interested in the identity (name and street address) of individual firms and, pursuant to the terms of our contract with EPA and the "individual secrecy agreements" which have been signed by the project staff, we will treat as confidential all data given to TRW on such a basis.

To provide our input to EPA in time for finalizing hazardous waste management regulations, our contract with EPA calls for a completion date of 15 August 1979. Based on this extremely tight schedule, we would very much like to complete our data acquisition effort by the first week in July. Any assistance that you could render in expediting our request for data would be greatly appreciated.

Sincerely,


Masood Ghassemi, Ph.D., P.E.
Senior Project Engineer

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cc: Ms. Jan Auerbach (EPA/OSW)