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TO: W. S. HILLMAN
FROM: J. F. BRATCHER

RCRA HAZARDOUS WASTE ANALYSIS

As you are probably aware, Title 40 CFR Part 261.24 was amended on 11/19/80 to revise the entry for EPA Hazardous Waste Number D007. D007 classification is now based on EP toxicity levels of hexavalent chromium rather than total chromium. The TiO₂ ore refining acid sludge was resampled on 11/5/80 and again put through the EP procedure. The resulting solution was analyzed for Cr VI and also Pb. Results were reported by D. D. McLain on 12/12/80 as <.005 mg/l and 4.8 mg/l, respectively. The accuracy of the Cr VI analysis was also cross-checked with a "spiked" Cr VI sample and confirmed.

Based on these results, the TiO₂ ore refining acid sludge no longer is a RCRA toxic waste (Cr VI levels <5 mg/l) and should be delisted as such from previous site EPA RCRA submissions, site EPA RCRA Preparedness and Emergency Procedures, and previous waste disposal contractor notifications as soon as possible. Also, please send me copies of these notifications for transmittal to C&P Wilmington E&RA personnel.

JFB:np

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