

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 P Street, 4th Floor
P.O. Box 806
Sacramento, CA 95812-0806



(916) 322-3670

February 25, 1992

Mr. Takehisa Miyake
Executive Vice President
Golden State Metals, Inc.
P.O. Box 70158
Bakersfield, California 93387

Dear Mr. Miyake:

**NONHAZARDOUS CLASSIFICATION OF TREATED AUTO SHREDDER WASTE FROM
GOLDEN STATE METALS, INC. (WASTE EVALUATION UNIT FILE #F108)**

The Alternative Technology Division (ATD) of the Department of Toxic Substances Control (Department) has completed its review of the October 7, 1991, application and subsequent additional information dated December 27, 1991. This application was prepared on your behalf by Mittelhauser Corporation for approval to classify and manage treated auto shredder waste (TASW) as nonhazardous pursuant to Section 66260.200(f), Title 22, California Code of Regulations, [22 CCR 66260.200(f)]. Upon review of the submitted analytical data, the Department finds that the TASW pile generated during current daily operations possesses mitigating physical and/or chemical characteristics which render it insignificant as a hazard to human health and safety, livestock and wildlife. The Department, therefore, approves your request to classify the TASW as nonhazardous pursuant to 22 CCR 66260.200(f).

BACKGROUND

Golden State Metals, Inc., which is located in Bakersfield, California, shreds auto bodies and other scrap metal items. Auto shredder waste (ASW) consists of shredded plastic, rubber and fibrous material that remains after automobiles (and appliances) are shredded and the ferrous and non-ferrous metals have been removed. The metals are separated from the shredded material for recycling. The fibrous material from seats, carpets and insulation is removed and disposed of in a Class III landfill. The remaining ASW is then treated and is the subject of this waste classification request.

According to the application and additional information, this nonhazardous classification is being requested for currently generated TASW's which are presently stockpiled. This pile, which is the subject of this classification, is separate from a pre-existing stockpile consisting of approximately 50,000 tons of ASW which was deposited by the former owner of Golden State Metals, Inc.



Mr. Takehisa Miyake
February 25, 1992
Page 2

The material was passed over a shaker to remove pieces larger than one inch prior to treatment. The fine material (smaller than one inch) is then treated using K-20 (a potassium-silicate mixture with dispersing agents) in combination with cement or pozzalime.

CHARACTERIZATION AND DISCUSSION

Samples of the TASW were analyzed for the following characteristics, the results of which were provided in the original application and subsequently requested information:

- 1) Total and soluble concentrations of the inorganic persistent and bioaccumulative substances, listed in 22 CCR, 66261.24(a)(2);
- 2) Soluble concentrations of constituents listed in 22 CCR, 66261.24 (a)(1), as determined using the Toxicity Characteristic Leaching Procedure (TCLP);
- 3) Acute aquatic toxicity as determined using the static 96-hour fish bioassay pursuant to 22 CCR 66261.24(a)(6);
- 4) Corrosivity pursuant to 22 CCR, 66261.22(a)(3), and;
- 5) Total concentrations of polychlorinated biphenyls (PCBs) pursuant to 22 CCR, 66261.24(a)(2).

The waste is not expected to exhibit the characteristics of reactivity or ignitability so testing was not performed for either characteristic.

Review of the results of the above analytical testing revealed the following:

- 1) The TASW is not corrosive. When mixed with an equal weight of water, as specified in Section 66261.22(a)(3), 22 CCR, the mean pH of the TASW is 11.9, with an 80 percent upper confidence level (UCL) of 12.36;
- 2) The TASW is not acutely toxic as measured by the 96-hour aquatic bioassay specified in Section 66261.24(a)(6), 22 CCR;

Mr. Takehisa Miyake
February 25, 1992
Page 3

- 3) None of the soluble constituents listed in Section 66261.24 (a)(1), 22 CCR, as measured by the TCLP, exceed their respective regulatory thresholds;
- 4) Total concentrations of PCB's do not exceed the regulatory threshold of 50 mg/kg;
- 5) Of the constituents listed in Section 66261.24 (a)(2), copper, lead and zinc exceed their total threshold limit concentrations. With the exception of inorganic lead, the soluble concentrations for the metals of concern in the TASW as measured by the Waste Extraction Test (WET) are below their respective regulatory threshold values. The mean WET soluble lead concentration in the TASW is 26.8 mg/l, with an 80 percent upper confidence level (UCL) of 37.9 mg/l, which is greater than the regulatory threshold of 5 mg/l.

CONCLUSION

The Department has reviewed the submitted data and has determined that the TASW has mitigating physical and/or chemical characteristics which render TASW insignificant as a hazard to human health and safety, livestock and wildlife pursuant to 22 CCR 66260.200(f). Accordingly, TASW currently generated from Golden State Metals is classified as a nonhazardous waste.

This classification does not apply to the pre-existing stockpile of approximately 50,000 tons of ASW, nor does it apply to that portion of untreated ASW which has been separated from the currently generated TASW.

In the event that your TASW changes to the extent that the Department's determination can no longer be supported by the information submitted in your application, or for any of the reasons listed in Section 66260.200(i), 22 CCR, Golden State Metals, Inc. must immediately begin managing its TASW as a hazardous waste in accordance with all provisions set forth in Division 4.5, 22 CCR.

The management and disposal of your TASW remains subject to the Regional Water Quality Control Board and other local regulatory agencies.

Mr. Takehisa Miyake
February 25, 1992
Page 4

If you have any questions regarding this nonhazardous classification, you may contact Ms. Diana Peebler of my staff at the letterhead address or telephone number.

Sincerely,



Ronald Pilorin
Alternative Technology Division

cc: Mr. Keith Riley
Department of Toxic Substances Control
Region 1/Sacramento
10151 Croydon Way
Sacramento, California 95827

California Regional Water Quality
Control Board
Central Valley Region
Fresno Branch Office
3614 East Ashlan Avenue
Fresno, California 93726

Mr. Steve McCalley, Director
Kern County Environmental Health
2700 M Street, Suite 300
Bakersfield, California 93301

Mr. Raymond Ouellette
Mittelhauser Corporation
23272 Mill Creek Drive, Suite 300
Laguna Hills, California 92653

Val Siebal
REGION 1/SACRAMENTO
Department of Toxic Substances Control
10151 Croydon Way
Sacramento, California 95827

Howard Hatayama
REGION 2/BERKELEY
Department of Toxic Substances Control
700 Heinz Avenue, Bldg. F, Second Floor
Berkeley, California 94710

Mr. Takehisa Miyake
February 25, 1992
Page 5

Dennis Dickerson
REGION 3/BURBANK
Department of Toxic Substances Control
1405 N. San Fernando Boulevard
Burbank, California 91504

John Hinton
REGION 4/LONG BEACH
Department of Toxic Substances Control
245 W. Broadway, Suite 350
Long Beach, California 90802

Mr. Greg Williams
Alternative Technology Division
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Ron Pilorin
Alternative Technology Division
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Ms. Diana Peebler ✓
Alternative Technology Division
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

RP:DP:dp/al