

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320



(916) 322-2822

December 19, 1988

Mr. George Adams, Jr., President
Orange County Steel Salvage, Inc.
3200 E. Frontera Road
Anaheim, CA 92806

Dear Mr. Adams:

SUBJECT: ORANGE COUNTY STEEL SALVAGE, NONHAZARDOUS CLASSIFICATION
OF TREATED AUTO FLUFF

On July 18, 1988, Region 4/Long Beach of the Toxic Substances Control Division of the Department of Health Services (DHS) requested that the Alternative Technology Section classify treated auto shredder waste from Orange County Steel Salvage. This treated auto shredder waste consists of newly generated waste after it has been chemically fixed and solidified with a "generic" silicate mix and cement. (This letter is not addressing the existing PCB contaminated pile).

DHS reviewed the initial set of laboratory data from samples taken between April 29 and August 12 of 1988, and found the information to be incomplete. As of December 6, 1988, the Alternative Technology Section now has all the laboratory data from samples taken between August 23 and October 10 of 1988 and found the information complete for waste classification purposes. The treated waste does not exhibit the characteristics of corrosivity or acute aquatic toxicity. This waste is not expected to exhibit the characteristics of reactivity or ignitability. Auto shredder waste is known to have total concentrations of various metals in excess of their respective regulatory threshold values. The data received for purposes of this classification did not include total concentrations. Except for inorganic lead, the soluble concentrations for the metals of concern in the treated waste are below their respective regulatory threshold values. The soluble lead concentration in the treated waste is greater than the regulatory threshold value of 5 mg/l, but is lower than 50 mg/l.

DHS has found that some wastes, such as treated auto shredder waste, with soluble lead concentrations below 50 mg/l and total concentrations in excess of their regulatory threshold values may be classified and managed as nonhazardous because of mitigating physical or chemical characteristics which render the respective waste an insignificant hazard to human health and safety, livestock, and wildlife.

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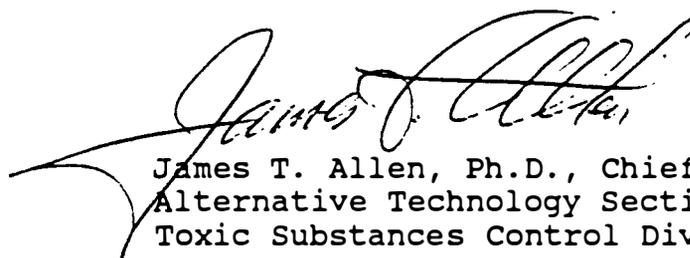
Pursuant to Section 66305(e), Title 22, California Code of Regulations (CCR), DHS has determined that the newly generated auto shredder waste from Orange County Steel Salvage, when treated with the "generic" silicate mix and cement, is classified as a nonhazardous waste.

In the event that your treated waste changes to the extent that the DHS determination can no longer be supported by previously submitted information or for any of the reasons listed in Section 66305(i), Title 22, CCR, Orange County Steel Salvage must immediately begin managing its treated auto shredder waste as a hazardous waste according to all provisions set forth in Chapter 30, Title 22, CCR.

The management and disposal of this waste remains subject to the requirements of the Regional Water Quality Control Board and local agencies.

Any questions regarding the DHS determination may be directed to Carol Carollo at (916) 322-3670.

Sincerely,

A handwritten signature in black ink, appearing to read "James T. Allen", is written over a horizontal line. The signature is fluid and cursive.

James T. Allen, Ph.D., Chief
Alternative Technology Section
Toxic Substances Control Division

cc: Jack Kearns, Chief
Region 4/Long Beach
Toxic Substances Control Division
245 W. Broadway, Room 360
Long Beach, CA 90802

Regional Water Quality Control Board
Santa Ana Region (8)
6809 Indiana Avenue, Suite 200
Riverside, CA 92506

Regional Water Quality Control Board
Los Angeles Region (4)
107 S. Broadway, Room 4027
Los Angeles, CA 90012

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cc: Robert E. Merryman, Director
Orange County
Environmental Health
P.O. Box 355
1725 West 17th Street
Santa Ana, CA 92702

John W. Poole
Code Enforcement
City of Anaheim
200 S. Anaheim Blvd.
Anaheim, CA 92805

Jeff Bowman, Fire Chief
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500 E. Broadway
Anaheim, CA 92805

JA:CC:al