

## DEPARTMENT OF HEALTH SERVICES

714/744 P STREET  
SACRAMENTO, CA 95814

(916) 322-3670

September 20, 1988

Mr. Harry Faversham  
Executive Vice President  
Clean Steel, Incorporated  
2061 East 220th Street  
Long Beach, CA 90810

1/24/89  
copies of  
drafts are in  
Clean Steel file  
- EJP

Dear Mr. Faversham:

The Alternative Technology Section (ATS) of the Department of Health Services (DHS) has received your letter dated May 2, 1988, requesting that Clean Steel, Incorporated (CSI) and Hugo Neu-Proler (HNP) discontinue the removal of tailpipes and mufflers from automobiles prior to use as raw feed. You included test data from waste generated from 700 tons of processed raw material, of which approximately ten percent of the raw feed consisted of automobiles with the tailpipes and mufflers attached. In order to achieve the soluble metals levels that Truesdail laboratory data reports, additional chemicals (posse lime and K-20) were added in the process.

You are proposing changes in your waste to the extent that data submitted for the classification of the existing nonhazardous waste classifications for CSI and HNP, pursuant to Section 66305(e), Title 22, California Code of Regulations (CCR) would no longer be applicable. Therefore, further analysis on the proposed waste is needed to assess the mitigating physical and/or chemical properties of the waste, pursuant to Section 66305(e), CCR, since the raw feed is changed and additional chemicals are added. Further analysis required are the fish bioassay test pursuant to Section 66696(a)(4); total concentrations of chromium, cadmium, copper, lead, mercury, nickel, and zinc pursuant to Section 66699; and pH pursuant to Section 66708. A minimum of four representative samples from each facility (CSI and HNP) are required to be analyzed before complete review of your request can be made. CSI and HNP need to submit data from each of their own facilities as the classification requests will be handled separately.

Since CSI and HNP are each requesting a nonhazardous waste classification pursuant to Section 66305(e), Title 22, CCR, due to changes in the waste, the new waste generated must be handled as hazardous waste until a nonhazardous classification is issued by DHS unless a variance for disposal is requested and granted pursuant to Section 66310.

OFFICIAL FILE COPY  
TOXIC SUBSTANCES CONTROL DIVISION  
CENTRAL FILE UNIT

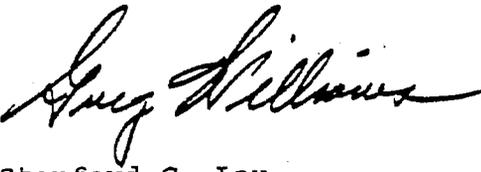
Mr. Harry Faversham

Page 2

September 20, 1988

If you have any questions concerning this matter, please contact  
Corey Yep at (916) 322-3670.

Sincerely,

*for* 

Stanford C. Lau  
Alternative Technology Section  
Toxic Substances Control Division

cc: Rick Brausch  
REGION 4/LONG BEACH  
Toxic Substances Control Division  
245 W. Broadway, 3rd Floor  
Long Beach, CA 90802

James Wotherspoon  
Hugo Neu-Proler  
P.O. Box 3100  
901 New Dock Street  
Terminal Island, CA 90731

SCL:CY:vs