

DEPARTMENT OF HEALTH SERVICES

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



(916) 322-3670

February 23, 1990

Mr. Thomas Hightower
Vice President/General Manager
Ferromet, Incorporated
P.O. Box 127
Etiwanda, CA 91739-0127

Dear Mr. Hightower:

TREATED AUTOSHREDDER WASTE CLASSIFICATION: AUTOMOBILES WITH
TAILPIPES AND MUFFLERS INCLUDED (WEU FILE #25)

Thank you for your letter dated January 3, 1990, requesting the Department of Health Services (Department) to classify treated autoshredder waste generated from the shredding of automobiles on which the mufflers and tailpipe assemblies remained. The request was for a nonhazardous classification for treated autoshredder waste with exhausts (TASW-E) pursuant to section 66305(e), Title 22, California Code of Regulations (22 CCR). The Department has reviewed the data that you have provided and has determined that the waste characteristics have not significantly changed from the original classification of treated autoshredder waste (TASW) issued on December 8, 1987. The Department has determined, therefore, that TASW-E is also nonhazardous pursuant to section 66305(e), 22 CCR.

Background

Ferromet, Incorporated (Ferromet) received a nonhazardous TASW classification pursuant to section 66305(e), 22 CCR from the Department on December 8, 1987. The December 8, 1987 letter included the following paragraph:

"In the event that your waste changes to the extent that the Department's determination can no longer be supported by previously submitted information or for any of the reasons under 66305(i)[22 CCR], FI [Ferromet, Incorporated] must immediately begin managing its treated autoshredder waste as a hazardous waste according to all of the provisions set forth in Chapter 30, CAC [22 CCR]."

Historically, automobiles shredded by Ferromet have had their tailpipes and mufflers removed by suppliers of scrap automobiles prior to their acceptance by Ferromet. Ferromet is proposing to leave tailpipes and mufflers on the vehicles to be shredded because of the difficulties that removing the tailpipes and mufflers pose to their automobile suppliers. The Department

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considers the inclusion of automobile tailpipes and mufflers a feedstock change in the autos shredding operation which may potentially change the characteristics of the waste generated. In order to consider including automobile tailpipes and mufflers in the waste-generating process, on December 5, 1989 you contacted Ms. Corey Yep of this office to determine the specific requirements the Department might have for "approving" this process change.

On January 3, 1990, Ferromet submitted analytical reports from Enseco-CRL, a certified hazardous waste testing laboratory, which consisted of data from a trial run that generated TASW-E. On January 3, 1990 Ferromet also submitted a check to the Department in the amount of \$7500.00 for fees assessed by the State Board of Equalization for classification of wastes pursuant to section 25205.8, California Health and Safety Code.

Discussion and Conclusions

The Department reviewed the TASW-E data submitted and compared it with the TASW data from the original nonhazardous classification made on December 8, 1987. The Department finds that there are no statistically significant differences between the two sets of data. The inclusion of automobile tailpipes and mufflers did not affect the waste characteristics of TASW. Therefore, the Department finds that the nonhazardous waste classification pursuant to section 66305(e), 22 CCR is applicable to TASW which has been derived from the shredding of automobiles with the tailpipes and mufflers intact.

The conditions stated in the second paragraph of this letter are still applicable to the nonhazardous classification of TASW-E. The management and disposal of your waste remains subject to the requirements imposed by the Regional Water Quality Control Boards and local regulatory agencies. If you have any questions concerning this letter or the classification, please contact Richard Brausch at the letterhead address or telephone number.

Sincerely,



Caryn Woodhouse
Alternative Technology Division
Toxic Substances Control Program

cc: See next page.

Mr. Thomas Hightower

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John J. Kearns, Regional Administrator
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bcc: Rick Brausch

CW:RB:rb:ba

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814

(916) 322-3670



December 8, 1987

Mr. Leo Frankel, President
Ferromet, Inc.
P.O. Box 127
Etiwanda, CA 91739-0127

Dear Mr. Frankel:

We have received the laboratory analyses characterizing Ferromet, Inc.'s (FI) treated and untreated auto shredder waste. These data were published on Chemical Research Laboratories, Inc. (CRL) letterhead with laboratory report dates of September 29 and November 25, 1987. The data contained in these reports represent the analytical results from samples taken by FI and submitted to CRL on September 14 and November 19, 1987. The waste stream sampled is a new waste stream that reflects the process line changes initiated by FI under the direction of George Trezak, Ph.D., of the University of California at Berkeley.

Based on the results published in the above-mentioned reports for K-20 treated auto shredder waste, the Department has determined that such wastes have mitigating physical and/or chemical characteristics which render it insignificant as a hazardous waste pursuant to Section 66305, Title 22, California Administrative Code (CAC). Therefore, this waste is classified as a nonhazardous waste.

In the event that your waste changes to the extent that the Department's determination can no longer be supported by previously submitted information or for any of the reasons under 66305(i), FI must immediately begin managing its treated auto shredder waste as a hazardous waste according to all of the provisions set forth in Chapter 30, CAC.

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 Department's determination may be directed to Peter Wood of my staff at (916) 324-1807.

Sincerely,

for A handwritten signature in cursive script, appearing to read "David J. Leu".

David J. Leu, Ph.D., Chief
Alternative Technology Section
Toxic Substances Control Division

cc: See next page.

Federal Express - 12-8-87

CONF # 304

(9522 Etiwanda Ave.)

cc: Angelo Bellomo, Chief
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DJL:PW:tg