

## DEPARTMENT OF HEALTH SERVICES

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



(916) 322-3670

October 17, 1989

Mr. Nick Andrusyshyn  
Operations Manager  
Schnitzer Steel Products Company  
Foot of Adeline Street  
P.O. Box 747  
Oakland, CA 94604

Dear Mr. Andrusyshyn:

TREATED AUTOSHREDDER WASTE CLASSIFICATION: INCLUSION OF TAILPIPES  
AND MUFFLERS

Thank you for your letter dated March 29, 1989, requesting the Department of Health Services (Department) to classify treated autoshredder waste generated from autoshredding operations that would include the shredding of automobile tailpipes and mufflers (TASW-TM). You are requesting a nonhazardous classification for TASW-TM pursuant to Section 66305(e), Title 22, California Code of Regulations (22 CCR 66305(e)). The Department has reviewed the data that you have provided and has determined that the waste characteristics have not significantly changed from the Department's original classification of treated autoshredder waste (TASW) issued on June 13, 1988. The Department, therefore, has determined that TASW-TM is also nonhazardous pursuant to 22 CCR 66305(e).

Background

Schnitzer Steel Products Company received a nonhazardous TASW classification pursuant to 22 CCR 66305(e) from the Department on June 13, 1988. The June 13, 1988, letter includes the paragraph:

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

SSP is proposing to include automobile tailpipes and mufflers into the autoshredding operation. The Department considers the inclusion of automobile tailpipes and mufflers as a feedstock change in the autoshredding 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, SSP requested the Department on March 29, 1989 to review data from a pilot study that generated TASW-TM and determine whether a nonhazardous classification pursuant to 22, CCR 66305(e) would still be appropriate.

On June 6, 1989, pursuant to Ms. Corey Yep's telephone conversation with you, SSP submitted Sequoia Analytical laboratory reports to the Department. Upon review of the additional data, Ms. Yep informed you on July 27, 1989, that additional soluble zinc analyses pursuant to the Waste Extraction Test (WET) were needed to complete the evaluation of the TASW-TM. The additional WET-soluble zinc data were submitted to the Department on August 22, 1989. On September 14, 1989 SSP sent a check in the amount of \$7500.00 to the Department for fees assessed by the State Board of Equalization for classification of wastes pursuant to section 25205.8, Health and Safety Code, which was chaptered and coded on August 2, 1989.

#### Discussion and Conclusions

The Department reviewed the TASW-TM data submitted and compared it with TASW data from the original nonhazardous classification made on June 13, 1988. The Department finds that there are no significant changes 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 22 CCR 66305(e) is applicable to TASW which includes the shredding of automobile tailpipes and mufflers.

The conditions stated in the second paragraph of this letter are still applicable to the nonhazardous classification of TASW-TM. The management and disposal of your waste remains subject to the requirements imposed by the Regional Water Quality Control Board and local regulatory agencies.

Mr. Nick Andrusyshyn  
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If you have any questions concerning this letter, please contact Corey Yep at the letterhead address or telephone number.

Sincerely,



Caryn Woodhouse  
Alternative Technology Division  
Toxic Substances Control Program

cc: Howard Hatayama, Regional Administrator  
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CW:CY:db

## DEPARTMENT OF HEALTH SERVICES

714/744 P STREET  
SACRAMENTO, CA 95814



(916) 322-3670

June 13, 1988

Mr. Nick Andrusyshyn  
Operations Manager  
Schnitzer Steel Products Co.  
Foot of Adeline Street  
P.O. Box 747  
Oakland, CA 94604

Dear Mr. Andrusyshyn:

The Department of Health Services has received the laboratory analyses characterizing Schnitzer Steel Products Co. (SSP) untreated and treated auto shredder waste. These data were published on Sequoia Analytical Laboratory letterhead with laboratory report dates between April 1 and May 4, 1988. The data contained in these reports represent the analytical results from samples collected over a six-week period (March 17 - April 22, 1988) by SSP and submitted to Sequoia Analytical Laboratory. The waste sampled is a new waste that reflects the process line changes (referred to as the K-20 treatment) initiated by SSP under the direction of George Trezek, Ph.D., of the University of California at Berkeley.

Samples of the untreated and treated auto shredder waste were analyzed for total and soluble metal concentrations, total PCB concentration, pH (treated only) and acute aquatic toxicity (treated only). Based on the results published in the above mentioned reports for K-20 treated auto shredder waste, the Department has determined that the waste has mitigating physical and/or chemical characteristics which render it insignificant as a hazard to human health and safety, livestock and wildlife pursuant to Section 66305(e) Title 22, California Code of Regulation (CCR). Therefore, the 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 the information submitted or for any of the reasons stated in Section 66305(i), Title 22, CCR, SSP 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 your waste remains subject to the requirements imposed by the Regional Water Quality Control Board and local regulatory agencies.

Mr. Nick Andrusyshyn

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June 13, 1988

If you have questions regarding the Department's determination, you may contact Cindy Oshita of my staff at (916) 322-3670.

Sincerely,



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

cc: Dwight Hoenig, Chief  
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