

# Memorandum

(G-8)  
To : Don Maughan, Chairman  
State of California  
State Water Resources Control Board  
901 P Street

Date : APR 27 1988

Subject: Regulation of 901  
Auto Shredder Waste

From : Toxic Substances Control Division  
714/744 P Street  
3-2913

The regulation of auto shredder waste has presented a major challenge to the Department of Health Services (DHS) since 1984. We have not, however, been alone in this endeavor. We recognize and appreciate the efforts made by the State Water Resources Control Board (Board) to resolve some of the problems associated with this issue.

On March 19, 1987, the Board adopted Resolution 87-22. This resolution provided guidelines for the disposal of auto shredder waste in qualified Class III waste management units and was successful in providing a viable disposal option to members of the regulated community.

In keeping with the spirit of interagency cooperation which led to the adoption of Resolution 87-22, DHS is requesting the assistance of the Board to examine another issue relating to the disposal of auto shredder waste. Several auto shredders within the State have recently incorporated in-line treatment systems in their shredder operations. Wastes from a number of these facilities have been granted a nonhazardous waste classification from DHS. There appears to be a lack of uniformity, however, among some of the Regional Water Quality Control Boards (RWQCB) regarding the status of this waste. The Los Angeles RWQCB, for instance, has required Los Angeles County's BKK Landfill to amend its Waste Discharge Requirements prior to accepting nonhazardous treated auto shredder waste. The Santa Ana RWQCB, however, has designated San Bernardino County's Milliken Landfill and Fontana Landfill as authorized to accept treated auto shredder waste pursuant to Regional Board Resolution No. 87-108.

Treated auto shredder wastes have shown characteristics compatible with land disposal such as compactness and low metal solubility. These features, along with a DHS nonhazardous classification, lead us to believe that disposal of treated auto shredder waste in Class III landfills should be acceptable to the RWQCB.

To eliminate a potentially major problem in the area of treated waste disposal, we suggest that the Board consider developing a Resolution providing guidance for the disposal of treated auto

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shredder waste in Class III landfills. To aid in this effort, we offer the assistance of staff from our Alternative Technology Section who are familiar with the auto shredder issue.

We are looking forward to working with the Board in the future. If you have any questions regarding this matter, please contact David J. Leu, Ph.D., Chief of the Alternative Technology Section at (916) 322-2822.



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