

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MA 02203-2211

MEMORANDUM

DATE: May 9, 1995

UBJ: Sand Blast Additive (Treatment Interpretation)

FROM: Kenneth B. Rota, Environmental Protection Specialist *KBR*
RCRA Support Section
Region I

TO: Richard Kinch, Chief
Waste Treatment Residuals Branch

This memo is a "heads-up" regarding the use of a sandblast additive known as Blastox®. I have enclosed two reports submitted to me by the Army Corps of Engineers Research Laboratory located in Champaign, Illinois. The reports document a two year Army Corps study of Blastox®, a silicate-based sandblast additive. Blastox® was used in a removal/chemical fixation study by the Army Corps. The Army Corps verbally requested an opinion as to whether the use of this product in the sandblast grit is legitimate or is considered "treatment." If the additive is not considered treatment prior to use, the Army Corp also requested an interpretation as to whether the addition of water, after the sandblasting process, is considered treatment.

The product is silicate-based material that appears to have buffering capacity available. I have included my initial response to the Army Corps of Engineer for your information. My letter raised a number of issues and concerns that I have about this product. Since the waste generated by this type of process is generally not listed, it would appear that the TCLP test would be the main indicator of whether the Blastox® and sandblast grit mixture is hazardous. The fact that the additive is buffered is not a consideration in the TCLP test (despite using the more aggressive extract) and would enhance the ability of sandblast grit to pass the TCLP test.

My understanding is that if the regulatory status of the use of this product is favorable, DoD is prepared to gear up for a major lead removal initiative that is problematic at federal facilities.

My direct telephone number is (617) 573-5759 if you have any questions. OSW referred this issue to your program.