



DEPARTMENT OF THE ARMY
CONSTRUCTION ENGINEERING RESEARCH LABORATORIES, CORPS OF ENGINEERS
P.O. BOX 9005
CHAMPAIGN, ILLINOIS 61826-9005



May 26, 1995

REPLY TO
ATTENTION OF

Materials Science & Technology Division

U.S. Environmental Protection Agency
Mr. Richard Kinch, Chief
Waste Treatment Branch
401 M Street, S.W.
Mail Code 5302W
Washington, DC 20460

Dear Mr. Kinch:

Reference correspondence from Mr. Kenneth B. Rota, U.S. EPA New England Region, to the undersigned, dated May 9, 1995.

As explained in the attached correspondence, our office has investigated a proprietary product, Blastox[®], which chemically stabilizes debris generated during the abrasive blast removal of lead-based paint. Blastox[®] is a dry granular material that has a chemical composition and properties similar to portland cement. It is added to traditional sandblast abrasives at a rate of 20 to 25% by weight. The U.S. Army Construction Engineering Research Laboratories (USACERL) demonstrated the use of this product in lead paint removal projects at several Army installations. In each case the resultant waste leached lead at a rate of less than five parts per million when tested in accordance with the toxicity characteristic leaching procedure (TCLP).

Our laboratory also conducted an investigation of the mechanism of the fixation of lead that occurs with Blastox[®]. We found no evidence that the product reacts in the dry state to stabilize the lead in the waste. Based on the laboratory data, we concluded that the stabilization reaction occurs in the wet state, during the TCLP test or when the material otherwise comes in contact with water to initiate a hydration reaction. A copy of the draft USACERL report is attached.

Army environmental reviewers of the draft report have expressed concern about the interpretation of TCLP results of waste generated during blasting with an abrasive incorporating Blastox[®]. In addition, there is some concern over the need to wet the waste prior to disposal to initiate the hydration reaction. If wetting is deemed necessary, is this considered hazardous waste treatment requiring a permit? As Mr. Rota suggested in his letter, we are contacting your office to seek an interpretation of the regulatory status of this product.

If I can be of any assistance, I may be contacted at (217) 373-6753. I look forward to your response.

Sincerely,



Vincent F. Hock
Principal Investigator

Copies Furnished:

Susan Drozd

~~Ren Rota~~