



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 21, 1995

Mr. Thomas Andrews
New Hampshire Department of Environmental Services
Waste Management Division
6 Hazen Drive
Concord, NH 03301-6509

Dear Mr. Andrews:

Thank you for your telephone call requesting a determination regarding the metals precipitated from the groundwater at the Keefe Environmental Services Site in Epping, NH. You stated that the metals are the naturally occurring minerals in the groundwater. Specifically, you wanted to know if this waste stream (metals) could be disposed of as a solid waste. You stated that by using sodium hydroxide, the metals are precipitated out of groundwater in order to make the groundwater more amenable to treatment via air stripping.

Historically, contamination at the site was due to the transportation and storage of hazardous waste (i.e., Trichloroethylene, Tetrachloroethane, Dichloroethane, Benzene, and 1,1 Dichloroethylene). Based on the TCLP analysis, there were no volatile or semi-volatile constituents detected in the metals that were precipitated out of the groundwater. Also, the TCLP for these metals was well below regulatory limits.

Generally, residue (e.g., precipitated metals) from the treatment of a listed hazardous waste is also a listed hazardous waste. However, in this case the precipitated metals are derived from environmental media (e.g., groundwater) that contain a listed hazardous waste. If the precipitated metals do not contain any constituents of the listed hazardous waste, it is not considered to be a hazardous waste.

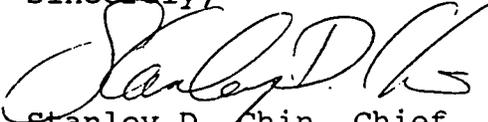
However, the high metals content in a waste stream has been known to mask TCLP results. It is recommended that a totals analysis be done to determine if any of the listed constituents of



concern are contained in the precipitated metals. If any hazardous constituents of concern are present, then the State of New Hampshire may make a determination as to whether the concentrations of these constituents pose a threat to human health and the environment.

If you have any questions regarding this matter, please do not hesitate to call Mel R. Cheeks at 617-223-5590.

Sincerely,

A handwritten signature in black ink, appearing to read "Stanley D. Chin". The signature is fluid and cursive, with the first name being the most prominent.

Stanley D. Chin, Chief
RCRA Support Section