Sharon Leitch

12/17/02 10:03 AM

To: tmooney@triumvirate.com
cc: Gary Gosbee/R1/USEPA/US@EPA, Ken Rota/R1/USEPA/US@EPA, Marv Rosenstein/R1/USEPA/US@EPA, Jeff Fowley/R1/USEPA/US@EPA, Steve Yee/R1/USEPA/US@EPA, Juiyu Hsieh/R1/USEPA/US@EPA, (bcc: Sharon Leitch/R1/USEPA/US)
Subject: (287135631) Region1 WWW Feedback

Dear Tim, this is a response to your e-mail question, listed below, regarding the status of your client's beryllium waste.

The listing for a P-waste specifically states that these types of wastes are any discarded commercial chemical product, any off-specification commercial chemical product, any residue remaining in a container that held any commercial chemical product, and any spill residues thereof. The P015 listing is for beryllium powder and applies to an unused commercial chemical product, that being the beryllium dust or powder. Unless the process by which your client has created this dust is a process where the intent is to produce a commercial chemical product (i.e. beryllium dust), the dust created would not be considered a hazardous waste due to the listing. However, the waste may be hazardous due to a characteristic and it is the responsibility of the generator of the waste to make this determination.

Please note that all of the New England States are authorized to administer and enforce the base RCRA program in lieu of the federal program and , in particular, have the regulatory authority regarding hazardous waste determinations. Therefore, you should consult with the appropriate State authority regarding your question.

Please do not hesitate to contact me if you have any questions regarding this response or require any further assistance.

Sincerely,

Sharon Leitch
Hazardous Waste Unit
EPA Region 1
(617)918-1647
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comments
I have a question about wheher or not the P015 applies to this waste stream. One of our clients machines beryllium stock. They either start from a piece of cold stock or in alot of cases they are re-machining an existing fixture. For size I am talking about pieces that fit in your hand or in some cases both hands. Small but machined to very specific tolerances. They have a vacuume hose right at the point of machining so they try to capture these minute particles. These particles then travel
up a pipe to the baghouse where they are seperated in the hanging
bags. Large particles drop to the bottom of the baghouse into a "dirtcan" and the smaller are trapped in the bags. Any that may escape are trapped
in the HEPA filter downstream prior to discharge. We are dismanteling this entire process and disposing it for them. Would the "dirtcan" or the baghouse filters be p-listed for beryllium?

Please e-mail me your thoughts.