WMX

Chemical Waste Management, Inc.

A WMX Technologies Company Phone 708.218.1500
3003 Butterfield Road
Oak Brook, IL 60521

November 1, 1996

Mr. Michael Petruska
Hazardous Waste Minimization and Management Division
Office of Solid Waste
U.S. Environmental Protection Agency
2800 Crystal Drive
Arlington, VA 22202

Dear Mr. Petruska:

This letter is in response to your request for additional data regarding comments submitted by Chemical Waste Management, Inc., (CWM) on the Agency's Notice of Data Availability on the Land Disposal Restrictions (LDR) Phase IV (61 Fed. Reg. at 21,418). Pursuant to that request CWM is submitting information regarding the following:

1) Detailed information of waste characterization;

2) Data, where available, on untreated and treated constituent concentrations;

3) Clarification of whether data is grab or composite;

4) Quality assurance/quality control information; and

5) Clarification of whether the data are from full-scale processes.

If you have any questions regarding this information please contact Mitch Hahn at (630) 218-1737.

Sincerely,

Kevin J. Igli

Kevin J. Igli
Vice President, Environment, Health & Safety

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I. INTRODUCTION

The information enclosed in this submittal directly relates to the treatment data submitted on June 17, 1996, by Chemical Waste Management. This treatment data is again being included with this information. Each section below will briefly address the questions regarding the data or explain the information submitted.

II. Detail Information of Waste Characterization

CWM is enclosing copies of 10 profiles (See Attachment 1) associated with 141 different batches of wastes treated containing D006-D009 waste codes. This data predominantly reflects treatment of D008 waste, and includes information regarding the process generating the waste and the waste name. Each profile has an assigned number that is located in the upper right hand corner of the page. When referring to the treatment report (See Attachment 2) the profile corresponding to the batch of treated waste will be identified next to the generator name.

III. Data On Untreated and Treated Constituents

Included with each profile is data reflecting the levels of metals present in the waste stream prior to treatment. This data comes from the original waste sample which is used to develop the treatment recipe. In some circumstances this test data only includes TCLP data, while in other cases it includes both TCLP and TCA.

IV. Grab vs. Composite Samples

The post treatment analysis data for the treated wastes contained in the report are based on grab samples of the treated waste streams.

V. Quality Assurance/Quality Control Information

Included in Attachment 3 is a copy of the QA/QC log maintained at the treatment facility. The first grouping of numbers under the sample I.D. column refer to the process date of the treatment batch. This information can then be cross referenced with the process date in the treatment report.

VI. Clarification of Data From Full-Scale Process

The post treatment analysis data contained in the report is from the actual full-scale stabilization of waste streams. It does not result from bench-scale testing.