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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 22 1996

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Mr. David B. Weinberg, Esq.
Battery Council International
Weinberg, Bergeson, and Neuman
1300 Eye Street, N.W., Suite 1000 West
Washington, D.C. 20005

Dear Mr. Weinberg:

This letter is in response to your comments (June 10, 1996) on the U.S. Environmental Protection Agency's (EPA) Notice of Data Availability on the Land Disposal Restrictions (LDR) Phase IV proposed rule. (61 FR 21418). With respect to the data that were originally submitted in November 1995 and were resubmitted by reference with the aforementioned comment, the Agency has reviewed the data, and is requesting additional information/data before it can be further evaluated. As you know, EPA's LDR program has specific requirements for any data that may be evaluated for possible Best Demonstrated Treatment Technology (BDAT) analysis. Based on these criteria, we require the following:

1) Corresponding untreated and treated constituent concentrations

2) Clarification of whether data were based on grab or composite sampling

3) Treatment design and operating conditions
- Binder-to-waste ratios
- Curing times
- Degree of mixing
- Stabilization temperature and humidity

4) Waste characteristics affecting performance

o It was noted in your comments that the waste matrix consisted of chloride and sulfated compounds that could prove troublesome to stabilize. However, further information on waste characterization is needed to determine if these compounds are interfering with the performance of stabilization.

5) Quality Assurance/Quality Control

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Please submit any additional information you may have to assist the Agency with reviewing your data submittal to Anita Cummings of my staff by August 7, 1996. All information submitted will be placed in the docket for the Phase IV rulemaking. Because we are promulgating under a negotiated schedule, if you claim your response or data are CBI, please justify that designation as required under 40 CFR 2. If you have any questions please contact Ms. Cummings at (703) 308-8303. Thank you for your timely attention to this matter.

Sincerely,

Rhonda M. Craig, for

Michael Petruska, Chief
Waste Treatment Branch