Meeting minutes between EPA and Inmetco
February 12, 1996

In Attendance:

Larry Rosengrant/EPA
Michael Petruska/EPA
Steve Silverman/EPA
Anita Cummings/EPA
John Onesco/Inmetco
Ken Money/Inmetco
Neil King/Inmetco

This meeting was called in order to address the issues surrounding the petition filed on the "grab vs composite" issue. After the promulgation of the Phase II rulemaking the High Temperature Metals Recovery industry petitioned the Agency. The petition addressed data used to develop the Phase II rulemaking were the same data used to develop K061. The petition exists because data submitted for the K061 rulemaking was based on composite sampling. During the development of K061 both composite and grab sampling were used to develop the treatment standard, whereas the treatment standards were promulgated using "composite". The Land Disposal Restrictions(LDR) Program is based on "grab" sampling not composite sampling.

The HTMR facilities were requested to submit grab sampling data. Inmetco submitted the grab data in December, 1994 and again in 1995 and 1996. The Agency requested input about the technology, the process and matrix, and what could account for the changes in TCLP for specific metals residuals in the wastestreams. (See Table 1 attached).

The Agency discussed the possibility of a variance, but it was decided that the Agency could not finalize this issue at that time.