MoD007140874

file

April 13, 1983

Mr. Alex Bourne
Vice President - Engineering
Talbot Industries, Incorporated
1211 Harmony Street
P. O. Box 608
Neosho, Missouri 64850

R00354321
RCRA RECORDS CENTER

Dear Mr. Bourne:

Dr. David E. Bedan has requested that I respond to your letter of March 18, 1983, concerning the status of Talbot Industries as a generator of hazardous wastes. Spent pickle liquor from your facility is listed in 40 CFR 261.32 of the U.S. EPA Regulations and 10 CSR 25-4.010(6) of the Missouri Hazardous Waste Management Regulations as K062, because of corrositivity and toxicity (lead and chromium). The Missouri Department of Natural Resources does not have authorization from EPA to delist a listed hazardous waste at a specific plant site at this time unless EPA has already done so. The following steps should be taken to delist the waste in accordance with 40 CFR, part 260.22 and 10 CSR 25-4.010(7):

1. Contact Mr. Myles Morse or Mr. William Sproat with the U.S. EPA, telephone number (202) 755-9187, to initiate the delisting process; and

2. DNR should be copied on all laboratory reports and any correspondence sent to EPA.

Until the pickle liquor is delisted, Talbot Industries should register the waste pickle liquor with the Missouri Department of Natural Resources in accordance with 10 CSR 25-5.010. Talbot Industries may continue discharging the treated pickle liquor into the Neosho POTW, in accordance with 260.395(13), RSMo (1980), as long as the facility is willing to accept the waste. Also, the hazardous waste generator fee is not applicable to this waste since it is discharged to the POTW.

EPA-ARWM/SPRS
APR 18 1983
Region VII, Kansas City, Missouri 64106

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

I apologize for the misunderstanding relative to your status as generator. Since Talbot Industries registered as a generator in 1980, it remains in our computer file as such until formally removed by the delisting process described herein. This is why you continue to receive correspondence from this office.

If there are questions concerning these procedures, please feel free to contact Mr. Joe Davis at (314) 751-3241, of my staff.

Sincerely,

Carol R Eighmey

Carol R. Eighmey, Chief
Planning and Management Section
Waste Management Program

CRE:KJD:ms

cc: Springfield Regional Office
Ms. Betti Harris, U.S. EPA, Region VII