



State of Ohio Environmental Protection Agency

Northwest District Office

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RECEIVED OCT 1 1993

George V. Volnovic  
Governor

Re: Brush Wellman  
Hazardous Waste  
Ottawa County

October 8, 1993

Mr. Larry Chako  
Brush Wellman  
14710 W. Portage River South Road  
Elmore, Ohio 43416-9502

Dear Mr. Chako:

This letter serves to follow-up on the September 21, 1993, meeting between Brush Wellman and the Ohio Environmental Protection Agency (Ohio EPA). The purpose of the meeting was to exchange information on the regulatory status of beryllium contaminated debris generated by Brush. The Agency appreciated the opportunity to discuss this matter. In summary, the purpose of the meeting and plant tour was to gain information on the various operations associated with the "high Be" portion of Brush Wellman's operation.

As you are aware, the Agency has been evaluating the applicability of the P015 (Beryllium dust) listing to various waste streams which are managed by Brush. The Ohio EPA has narrowed its focus to debris wastes generated in the production of various high beryllium products. This debris includes materials such as rags, personal protective equipment, baghouse filters and scrap steel. This waste stream has typically been managed as nonhazardous. Prior to our meeting, Brush had been instructed by the Agency to cease the off-site disposal of this material until the applicability of the P015 listing is determined.

During our meeting, we were presented with a detailed description of your high beryllium process. This included information on how certain wastes, such as baghouse dust, are recycled by being returned to the process. Based on information provided during the meeting, the potential exists to generate P015 waste from the powder metallurgy portion of the operation, including the material consolidation process. This primarily involves baghouse fines which are recycled and therefore never generated, but could include the debris mentioned previously. However, the Agency has considered the amount of "beryllium dust" contamination in most of the debris and concludes that, with the exception of the



3727

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Mr. Larry Chako  
October 8, 1993  
Page Two

baghouse filters, such debris contains only de minimis amounts of beryllium. Therefore in accordance with Ohio Administrative Code (OAC) Rule 3745-51-03(A)(2)(e)(iv), this debris would not be considered a P015 listed hazardous waste. We are still evaluating the listing applicability of the baghouse filters in these operational areas and request that until further notice, these be managed as a hazardous waste. We understand that the filter bags are only occasionally changed and therefore constitute a small portion of the debris waste stream. All other waste debris may be managed as nonhazardous.

We may request further information from Brush Wellman relative to the baghouse filters discussed above. The Agency intends to resolve this outstanding issue in the very near future.

If you should have any questions, please contact me at (419)352-8461.

Yours truly,

  
Jeffery A. Steers, R.S.  
RCRA Group Leader  
Division of Solid & Hazardous Waste Management

/rab

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