



**DIRECTIVE NUMBER:** 9444.06(80)

**TITLE:** Application of K061 Hazardous Waste Listing to  
Steel Foundries

**APPROVAL DATE:** 12-2-80

**EFFECTIVE DATE:** 12-2-80

**ORIGINATING OFFICE:** Office of Solid Waste

☒ **FINAL**

☐ **DRAFT**

**LEVEL OF DRAFT**

- ☐ A — Signed by AA or DAA
- ☐ B — Signed by Office Director
- ☐ C — Review & Comment

**REFERENCE (other documents):**

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Key Words: Steel Foundries

Regulations: 40 CFR §§261.32, 262.11

Subject: Application of K061 Hazardous Waste Listing to Steel Foundries

Addressee: William English, Vice-President, Operations, The Massillon Steel Casting Company

Originator: John P. Lehman, Director, Hazardous and Industrial Waste Division

Source Doc: #9444.06(80)

Date: 12-2-80

Summary:

The K061 hazardous waste listing under §261.32 applies only to the primary production of steel and not to steel foundries. The waste streams resulting from steel foundries are not listed as hazardous and only the §262.11 hazardousness standard must be applied to determine if the waste possesses any of the characteristics of hazardous waste.

DEC 2 1980

Mr. William English  
Vice-President, Operations  
The Massillon Steel Casting Company  
Massillon, Ohio 44646

Dear Mr. English

This letter will confirm the conversation you had with Mr. Myles Morse of my staff on October 20, 1980, concerning your petition to exclude the waste of The Massillon Steel Casting Company from the RC61 hazardous waste listing, (emission control dust/sludge from the electric furnace production of steel), under Section 261.32 of the hazardous waste regulations. The Massillon Steel Casting Company's facility in Massillon, Ohio, as indicated by your petition dated September 9, 1980, is a steel foundry and is therefore not affected by this RCRA hazardous waste classification. This reflects the Agency's finalized listings (see 45 FR 74390-292 (November 12, 1980)) which clarify that the listing RC61 applies only to the primary production of steel and not to steel foundries. This change was made since the listing background document refers throughout only to primary steel production. We are uncertain whether foundry electric furnace emission control dusts and sludges are sufficiently similar in composition to warrant inclusion in the same listing, and therefore have not included them in this listing. Foundry industry wastes are being evaluated and may be addressed by future Agency actions. At present, however, the Agency has formally terminated further processing of this petition. The petition will be kept on file with the Agency for future reference.

Your waste stream, therefore, will not be listed as hazardous. You are not required to take any action as a result of the May 19, 1980, interim final listing. You must still determine, however, whether your waste possesses any of the characteristics of hazardous waste (i.e., reactivity, corrosivity, ignitability or EP toxicity) as provided in §262.11 of the regulations. If your waste does not possess any of these characteristics, it will not be regulated under the hazardous waste management system. Should the waste possess a hazardous characteristic, you will be deemed a generator of hazardous waste, and be required to manage the waste under the hazardous waste management program. It should be noted that if your waste meets any of the four characteristics, you should have already obtained an EPA identification number by August 18, 1980.

Please feel free to contact Mr. Morse if you have any questions or problems. Mr. Morse's telephone number is (202) 755-9137.

Sincerely yours,

John P. Lehman  
Director  
Hazardous and Industrial Waste Division (WH-565)

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