



**DIRECTIVE NUMBER:** 9432.05(84)

**TITLE:** Definition of Treatment as Defined in 40 CFR  
Section 260.10 Subpart B - Definitions

**APPROVAL DATE:** 11-6-84

**EFFECTIVE DATE:** 11-6-84

**ORIGINATING OFFICE:** OSW

☒ **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: Treatment

Regulations: 40 CFR 260.10

Subject: Definition of Treatment as Defined in 40 CFR §260.10 Subpart B - Definitions

Addressee: James Scarbrough, Chief, Residuals Management Branch, Region IV

Originator: John H. Skinner, Director, Office of Solid Waste

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Summary:

The definition of treatment is made up of two parts:

- 1) The change in the waste's character affected by treatment.
- 2) The purpose of the change. Purposes include: to neutralize, to recover energy or material resources, to render such waste non-hazardous, safer to transport, store, or dispose; amenable for recovery, amenable for storage, or reduced in volume.

To be considered treatment, facility processes must serve one of the purposes listed in No. 2 above when changing the waste's character.

NOV 16 1984

MEMORANDUM

SUBJECT: Definition of Treatment; Application to  
Great Lakes Carbon Corp.

FROM: John H. Skinner, Director  
Office of Solid Waste (WH-562)

TO: James Scarbrough, Chief  
Residuals Management Branch  
EPA Region IV

We have reviewed and interpreted the definition of treatment as defined in 40 CFR 260.10, Subpart B - Definitions. The definition is made up of two parts: the change in the waste's character effected by treatment and the purpose of the change. Based on this definition, the process proposed by Great Lakes Carbon Corporation (GLCC) does not constitute treatment. GLCC's plan to add water to the cyanide contained in dissolvable plastic bags will change the physical character of the cyanide waste. However, the purpose of this change is to facilitate disposal. The change will not make the waste safer to dispose. None of those purposes listed in the definition, that is to neutralize; to recover energy or material resources; to render such waste non-hazardous or less hazardous, safer to transport, store, or dispose; or amenable for recovery, amenable for storage, or reduced in volume, apply to the process proposed by GLCC.

If you have any questions, please contact Mr. Thomas Baugh of the Waste Treatment Branch at FTS 382-2550.