

Scrap Metal Particularly Metallic Dust: A Troublesome Waste Stream

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Acme Metals Inc



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Acme Metals Inc.



Incoming Scrap Metal



Incoming Scrap Metal



Incoming scrap metal



Lead Dust, Stripping Machine, Dust Collector, & Processed Wire



SCRAP METAL UNDER RCRA

Scrap metal is defined as “bits and pieces of metal parts (e.g., bars turnings, rods, sheets, wire) or metal pieces that may be combined together with bolts or soldering (e.g. radiators, scrap automobiles, railroad box cars), which when worn or superfluous can be recycled.”

Processed scrap metal is scrap metal which has been handled to improve its economic value by separating, bailing, shredding, chopping, shearing, flattening, etc.

SCRAP METAL DESTINED FOR RECYCLING

	Processed	Unprocessed
Home Scrap Metal is scrap metal produced at a foundry, steel mill, furnace or casting operation-i.e. overcast, cut-offs	EXCLUDED AS SOLID WASTE 261.1(c)(9), 261.4(a)(13)	EXCLUDED AS SOLID WASTE 261.1(c)(9), 261.4(a)(13)
Prompt/Industrial/New Scrap Metal is produced by a machining process in a machine shop, metalworking or metal fabrication shop	EXCLUDED AS SOLID WASTE 261.1(c)(9), 261.4(a)(13)	EXCLUDED AS SOLID WASTE 261.1(c)(9), 261.4(a)(13)
Other Scrap Metal is found in storage facilities such as a scrap yard or stored at any other commercial facility	EXCLUDED AS SOLID WASTE 261.1(c)(9), 261.4(a)(13)	“Other” scrap metal is a RCRA solid waste per omission in 40 CFR 261.4(a)(13) If hazardous, however, is not subject to 40 CFR 262-266 or notification, per 40 CFR 261.6(a)(3)(ii). But is subject to speculative accumulation per 40 CFR 261.2(c)(4)

SCRAP METAL WHICH IS NOT DESTINED FOR RECYCLING

All Scrap Metal Not Recycled	IS RCRA SOLID WASTE AND IF HAZARDOUS, SUBJECT TO FULL REGULATION AS HAZARDOUS WASTE
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Internal Lead Dust Collector not Meeting the Def. of an Air Pollution Control Device



Lead-Contaminated Dust on the Floor



Lead-Contaminated Dust on Floor



In house Processed Lead Scrap Metal



08/19/2014 10:04

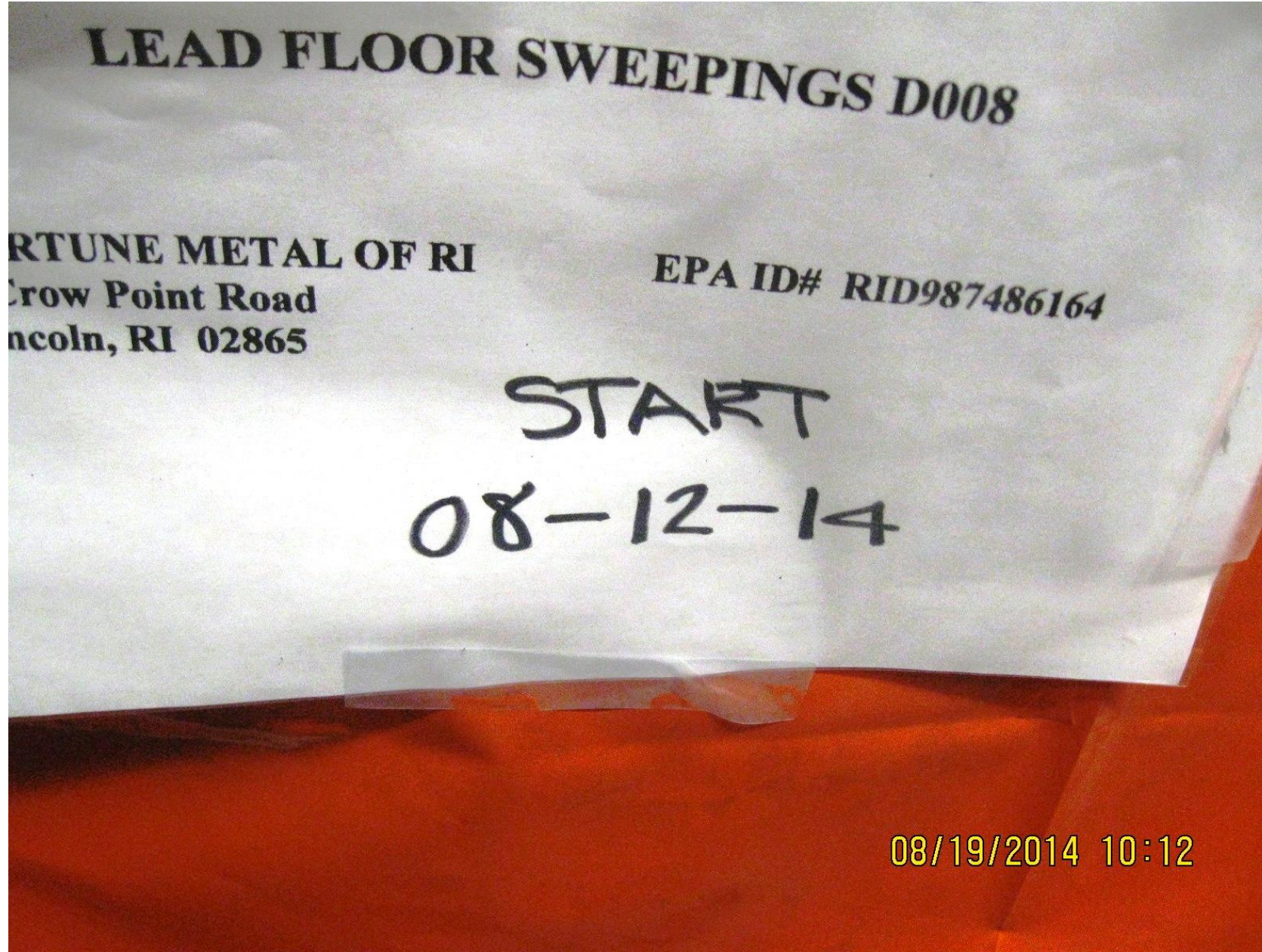
Processed Scrap Metal



Compliant 180-day Accumulation of HW Lead Dust



Compliant 180-day Accumulation of HW Lead Dust



Lead-Contaminated Employee PPE/Uniforms Destined for Laundering



Container 1 for Accumulation of Dust for Oven Dust Collector



Permitted Dual Dust Collector for Chopping Operation at “Acme Falls Building”



Contact

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