



REUSABLE INDUSTRIAL PACKAGING ASSOCIATION

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Mr. Michael Ebner
Office of Water, Engineering and Analysis Division (4303)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Effluent Limitations Guidelines, Pretreatment Standards and New Source Performance Standards for the Metal Products and Machinery Point Source Category; Proposed Rule (66 Fed. Reg. 424; January 3, 2001)

Docket No. W-99-23

The Reusable Industrial Packaging Association (RIPA) represents the industrial container reconditioning industry in North America. Its members include local, regional, and national businesses engaged in the cleaning and restoration of steel drums, plastic drums, intermediate bulk containers (IBCs) and other industrial packagings. RIPA also represents manufacturers of industrial packagings as well as suppliers to both manufacturers and reconditioners. RIPA's membership includes approximately 75 steel drum reconditioners who account for nearly 90 percent of all reconditioning by volume in North America. The majority of steel drum reconditioners are small businesses.

EPA is proposing wastewater treatment standards for the industrial category "Metal Products and Machinery" (MP&M). Treatment standards are proposed for facilities that discharge either directly to surface waters or to publicly-owned treatment works (POTWs). EPA developed its proposed standards based on sampling of wastewater from "unit operations" at a variety of metal repair and maintenance facilities. Many of the unit operations that were sampled resemble unit operations used by steel drum reconditioners. "Abrasive Blasting", "Alkaline Cleaning for Oil Removal", "Acid Treatment without Chromium" and "Wet Air Pollution Control - Acid/Alkaline" are examples of operations used by reconditioners. However, sampling of these units at facilities other than drum reconditioner plants does not provide for the myriad of constituents that enter a reconditioning plant - and hence its wastewater - as drum residues.

Reconditioners wash drums with a wide variety of residues. Their wastewaters vary significantly, both geographically and temporally, depending on the customer base. RIPA is unaware of any sampling as part of the MP&M project to characterize reconditioners' wastewaters. We believe such a characterization is a vital part of developing treatment standards for any source category. EPA should not assume its proposed standards in the "General Metals" subcategory are necessarily applicable to steel drum reconditioners based solely on the similarity of some unit operations. Indeed, any applicability is difficult to judge since the sampling data in "General Metals" was conducted on a unit operations basis. The only comparable data for steel drum reconditioners comes from a separate EPA project and was collected on a facility-wide, commingled basis rather than on a unit operations basis.

In this separate on-going action, EPA is assessing wastewater generation and management in the broader container reconditioning industry. Container reconditioning includes the reconditioning of steel drums, plastic drums, and IBCs. With RIPA's assistance, sampling of untreated wastewater was conducted at three reconditioning facilities in August 2000. The three facilities cover the different types of reconditioning (i.e., steel, plastic, IBCs). The results of that sampling have just been released. EPA and RIPA are currently reviewing that data. RIPA staff and representatives for the facilities sampled, along with other experts in wastewater treatment drawn from the RIPA membership, will consult with EPA about the sampling data. RIPA urges EPA to defer decisions on federal treatment standards for steel drum reconditioning to the on-going assessment of the container reconditioning industry. EPA should explicitly exclude steel drum reconditioning from the final rule for Metal Products and Machinery.

Presented here are EPA's average levels for metals in wastewaters from "Alkaline Cleaning for Oil Removal" (Unit Operation 5) in the General Metals subcategory compared with EPA's results from the sampling of co-mingled wastewater at the two reconditioning plants that perform caustic washing of steel drums for oil removal (among other things). In every case, the average level for the unit operation is *higher*, in some case *significantly* higher, than for the reconditioner plants. This simple analysis suggests that wastewaters at facilities sampled as part of "General Metals" are indeed significantly different from those at a reconditioner plant.

	General Metals (avg. mg/l) Unit Operation 5	Steel Drum Reconditioners (mg/l) co-mingled wastewaters	
Boron	178.147	29.000	2.500
Cadmium	0.767	non-detect	0.036
Chromium	10.603	1.900	0.210
Copper	13.407	0.760	0.670
Lead	27.645	4.800	1.600
Manganese	1.557	0.710	0.700
Molybdenum	0.992	1.100	0.770
Silver	0.084	non-detect	0.011
Tin	0.670	0.240	0.560
Zinc	91.058	13.000	24.000

Container reconditioning serves a useful environmental purpose. Significant savings in waste disposal capacity, air emissions and energy consumption are the result of container reconditioning. RIPA is unaware of any reconditioners who discharge directly to surface waters. Nor is RIPA aware of any problems with pass-through or interference created by reconditioners' discharges to POTWs. Any suggestions for federal standards should be identified and discussed through an assessment of reconditioning as a stand-alone industry.

RIPA appreciates the opportunity to comment on this important issue. Please call if you have any questions.

C.L. Pettit
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MyDocuments/Water Quality/MP&M Comments