

<u>SUBJECT</u>		<u>DATE</u>
1188. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190. Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191. Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192. Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193. Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194. Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CHPRC Environmental Protection, Hanford, WA

SUBJECT: HAZARDOUS WASTE "F" LISTINGS AND TRACE CONTAMINATION

DATE: SEPTEMBER 22, 2016

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Roni Ashley Tania Bates Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Marty Martin Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters Jeff Westcott Jeff Widney	Brett Barnes Mitch Boyd Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Sasa Kosjerina Jim Leary Dale McKenney Jon McKibben Rick Oldham Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson Jean Quigley	Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Hazardous Waste "F" Listings and Trace Contamination

Q: A customer has a miscellaneous container in need of cleaning. The customer uses a potentially "F" listed solvent mixture to rinse the interior of the container. The excess waste solvent is collected in a container and managed appropriately as an F001-F005 hazardous waste. The customer then uses a soap and water mixture to rinse any solvent residues remaining on the interior container walls. The customer collects the soap and water mixture containing trace amounts of solvent in a waste container. Is the soap and water/trace solvent mixture also an F001-F005 listed hazardous waste?

A: Per an EPA memo dated October 26, 1987 ([RO 11300](#)), the EPA addressed a similar situation involving the cleanout of a reactor and the generation of F003 solvents. Following collection of the F003 spent solvent, the reactor was rinsed with a soap and water solution to remove any residual solvent. Concerning the "F" listed status of the soap and water mixture the EPA stated:

"Based on this scenario, the Agency's interpretation is that the solvent-contaminated washwater is not within the scope of the Hazardous Waste No. F003 listing for spent nonhalogenated solvents. The subject waste stream is generated from the washout of a reactor vessel containing residues of solvent and fragrance oils. Therefore, the waste is not a spent solvent, but a process wastewater contaminated with solvent constituents. This waste is very different from a solvent stream that has been used and as a result of contamination can no longer be used as a solvent without further processing (see Section 261.2(c)(1) and 50 FR 53316). It is not the Agency's intent to regulate water from washout of a reactor vessel as F003."

Based upon EPA's guidance, the customer's soap and water mixture containing trace solvent would not be regulated as an F001-F005 listed hazardous waste. The soap and water/trace solvent mixture would still be subject to hazardous waste determinations for any other potential listings, characteristics, or Washington State criteria but the F003 listings would not apply.

SUMMARY:

- Certain spent solvents, when used for their solvent properties, can meet the definition of F001-F005 hazardous wastes.
- Following collection of the spent solvents, a trace amount of residual solvent will remain on the cleaned surface.
- This trace amount of residual solvent is not a spent solvent and therefore cannot meet the definition of an F001-F005 listed hazardous waste.

The October 26, 1987 EPA memo is attached to the e-mail. If you have any questions, please contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 9/22/16

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Hazardous Waste "F" Listings and Trace Contamination

OCT 26 1987

Faxback 11300
9442.1987(06)

Ronald J. Senna
Director - Environmental Compliance
International Flavors and Fragrances, Inc.
800 Rose Lane
Union Beach, N.J. 07735

Dear Mr. Senna:

This is in response to your letter of September 25, 1987, concerning the regulatory status of your fragrance ingredients. Based on the information you provided and the subsequent phone conversation with our consultant, Geo/Resource Consultants, Inc., EPA's understanding of the waste generation process is that Acetone, ethyl acetate, and xylene solvents are periodically used to clean out the reactor vessel. The spent solvents generated from that cleaning operation are drummed and sent off site for proper management as F003 wastes. A light coating or residue consisting of fragrance oils and trace amounts of solvents remains on the walls of the vessel. IFF then washes the vessel out with soap and water. This waste washwater carrying the oil and solvent residue then flows to an oil/water separator for treatment.

Based on this scenario, the Agency's interpretation is that the solvent-contaminated washwater is not within the scope of the Hazardous Waste No. F003 listing for spent nonhalogenated solvents. The subject waste stream is generated from the washout of a reactor vessel containing residues of solvent and fragrance oils. Therefore, the waste is not a spent solvent, but a process wastewater contaminated with solvent constituents. This waste is very different from a solvent stream that has been used and as a result of contamination can no longer be used as a solvent without further processing (see Section 261.2(c)(1) and 50 FR 53316). It is not the Agency's intent to regulate water from washout of a reactor vessel as F003.

If the washwater sent to the oil/water separator is ignitable, it would be classified as D001 hazardous waste, and would remain such for as long as it exhibits the ignitability characteristic. According to 40 CFR Section 261.3(c) and (d), any residues resulting from treatment of D001 are hazardous wastes only if they continue to exhibit a characteristic found under 40 CFR, Part 261, Subpart C.

If you have any further questions in this area, please contact Michael Petruska of my staff at (202) 382-7729.

Sincerely,

Original Document signed

Marcia E. Williams
Director, Office of Solid Waste

cc: Kurt Whitford, N.J. DEP
Sam Ezekwo EPA Region II, Air and Hazardous Waste Division

FROM: Paul W. Martin

DATE: 9/22/16

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