

<u>SUBJECT</u>		<u>DATE</u>
1253. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1254. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1255. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1256. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1257. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1258. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1259. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017
1260. Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 4, 2018
1261. Conservative Declaration that Material is a Hazardous Waste	ENCORE	JAN 11, 2018
1262. Defining Criteria for Household Waste Exclusion	ENCORE	JAN 18, 2018
1263. The Household Waste Exclusion and Renovation Debris	ENCORE	JAN 25, 2018
1264. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	FEB 1, 2018
1265. The Mixtures Rule – Washington State vs. The Feds	ENCORE	FEB 8, 2018
1266. Spent Lead-Acid Batteries and Secondary Containment	ENCORE	FEB 15, 2018
1267. Spent Lead-Acid Batteries and Accumulation Time Limits	ENCORE	FEB 23, 2018
1268. CERCLA Hazardous Substances – A Brief Definition	ENCORE	MAR 1, 2018
1269. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris	ENCORE	MAR 8, 2018
1270. RCRA Treatment and the Two-Part Definition	ENCORE	MAR 15, 2018
1271. Who Wants to be a Generator!!!	ENCORE	MAR 22, 2018
1272. Who Wants to be a Generator Part 2!!!	ENCORE	MAR 29, 2018
1273. "No Smoking" Signs and Tobacco-Free Facilities		APR 5, 2018
1274. Aqueous Solutions and the Characteristic of Corrosivity	ENCORE	APR 12, 2018
1275. Aqueous Solutions and the Characteristic of Ignitability	ENCORE	APR 19, 2018
1276. PCB Bulk Product Wastes and the One Year Disposal Requirement	ENCORE	APR 26, 2018
1277. PCB Radioactive Wastes and Exception Reporting	ENCORE	MAY 3, 2018
1278. TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date	ENCORE	MAY 10, 2018
1279. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	MAY 17, 2018
1280. Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation		MAY 24, 2018
1281. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit	ENCORE	MAY 31, 2018
1282. Universal Waste and Basis for the One Year Accumulation Time Limit	ENCORE	JUN 7, 2018
1283. F001 Degreaser versus F002 Solvent	ENCORE	JUN 14, 2018

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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:** F001 DEGREASER VERSUS F002 SOLVENT

**DATE:** JUNE 14, 2018

<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 Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Lorna Dittmer Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Sasa Kosjerina Jim Leary Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** F001 Degreaser versus F002 Solvent

**Q:** A customer operates a major pipe manufacturing plant. Part of the manufacturing process involves cleaning sections of newly formed pipe with tetrachloroethylene solvent. A review of [WAC 173-303-9904 \[40 CFR 261.31\]](#) indicates that tetrachloroethylene is a solvent listed in both the F001 and F002 hazardous waste listing. F001 wastes are basically defined as “degreasers” and F002 wastes are basically defined as “solvents”. What is the regulatory difference in a degreaser and a solvent and which hazardous waste code is appropriate for the customer’s waste?

**A:** Both the F001 and F002 hazardous waste listing include constituents used as solvents. However, F001 is limited to solvents used in degreasing. A RCRA Hotline Report Question dated October 1992, ([RO 13565](#)), states:

*“..., the F001 listing is by its terms, limited to spent solvents "used in degreasing.”*

Concerning the difference in F001 versus F002, a RCRA Hotline Report Question dated May 1991, ([RO 13469](#)), states that the F001 degreaser listing is appropriate when a solvent is used in "large-scale industrial degreasing operations". Alternatively, the F002 listing is appropriate when a solvent is used in equipment cleaning or in small-scale degreasing operations involving repair work such as maintenance, commercial service or consumer performed maintenance and repair.

Since the customer is a major manufacturer of pipe conducting degreasing operations on a large scale, the spent tetrachloroethylene would be considered a degreaser and subject to the F001 degreaser hazardous waste code.

### SUMMARY:

- F001 and F002 waste codes both reference similar solvent constituents.
- The F001 waste code is for “degreasers” and the F002 waste code is for “solvents”.
- A “degreaser” is a solvent that may be used in large-scale degreasing operations.
- A “solvent” is a solvent that may be used in small-scale degreasing operations or equipment cleaning.

The May 1991 RCRA Hotline Question is attached to the e-mail. If you have any questions, please contact me at [Paul\\_W\\_Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 6/14/18

**FILE:** 2MT\2018\061418.rtf

**PG:** 1

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** F001 Degreaser versus F002 Solvent

Faxback 13469

9444.1991(03)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MAY 1991

### 1. Comparative Definitions of F001 and F002

Tetrachloroethylene, trichloroethylene, methylene chloride, and 1,1,1-trichloroethylene are listed in the definitions of both F001 and F002 in 40 CFR 261.31. The listing for F001 reads "the following spent halogenated solvents used in degreasing...", while the F002 listing begins with "the following spent halogenated solvents...". Although F001 applies specifically to solvents used in degreasing according to the December 31, 1985 Federal Register the F001-F005 listings cover only those solvents used for their solvent properties. A solvent used in degreasing is considered to be used for its solvent properties. (50 FR 53316) Thus, a solvent, which is listed in both F001 and F002 (e.g., methylene chloride) and is used in degreasing, could be both F001 and F002. Would such a spent solvent be appropriately classified as F001, F002, or both?

It was not the intent of the Agency to apply both listings to a solvent constituent, which is listed in both F001 and F002. The waste code that the spent solvent receives depends on the type of degreasing involved. Page 6 of the "listing of Hazardous Waste (40 CFR 261.31 and 261.32); Identification and Listing of Hazardous Waste Under RCRA, Subtitle C, Section 3001" (also known as the Background listings Document) clarifies the intent of the F001 listing as opposed to other spent solvents. Specifically, the F001 listing is appropriate when tetrachloroethylene, trichloroethylene, methylene chloride, and 1,1,1-trichloroethane are used in large-scale industrial degreasing operations [e.g., cold cleaning, vapor degreasing (open top and conveyORIZED), and fabric scouring). Alternatively, tetrachloroethylene, trichloroethylene, methylene chloride, and 1,1,1-trichloroethane used in equipment cleaning or in smaller scale degreasing operations involving repair work (that do not employ industrial degreasing processes as described above), such as industrial, maintenance and repair, commercial service and repair, and consumer- performed maintenance and repair, receive the F002 listing.

Source: Ron Josephson, OSW (202) 475-6715

Research: Peter LeTourneau

*[Note that the F001 and F002 listings have been expanded since this May 1991 EPA memo to include additional constituents. F001 now also includes carbon tetrachloride and chlorinated fluorocarbons. F002 now also includes chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane.]*

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** F001 Degreaser versus F002 Solvent

Faxback 13565

PPC 9444.1992(04)

RCRA/Superfund/OUST Hotline Monthly Report Question

October 1992

### 1. Perchloroethylene Used in Dry Cleaning

A dry cleaner uses a 50 percent perchloroethylene (tetrachloroethylene) mixture in his cleaning process. Since tetrachloroethylene appears in the listing descriptions for both F001 and F002, would the spent solvent mixture be classified as F001 or F002?

Spent tetrachloroethylene used in dry cleaning is classified as F002 (40 CFR 261.31). The background listing document for F002 identifies certain industries that generate spent halogenated solvent meeting the F002 listing (Identification and Listing of Hazardous Waste, 261.31 and 261.32 -- Listing of Hazardous Waste, page 41). According to this document, tetrachloroethylene used in laundry and dry cleaning operations is regulated as F002. Of course, the spent solvent formulation must meet the 10 percent (by volume) before use criterion in the F002 listing. Furthermore, the F001 listing is by its terms, limited to spent solvents "used in degreasing."

**FROM:** Paul W. Martin

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**FILE:** 2MT\2018\061418.rtf

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