

<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

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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: REGULATORY STATUS OF SAND BLAST GRIT CONTAMINATED WITH TRACE LISTED SOLVENTS

DATE: SEPTEMBER 15, 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: Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents

Q: Last week's Two Minute Training ([090816](#)) discussed degreasing a metal part with solvent and that the trace solvents in the caustic rinse waters were not spent and hence would not meet the F listed hazardous waste description. But what about this scenario? A customer degreases metal parts with an F001-listed solvent and containerizes any excess spent solvent for management as F001 hazardous waste. The degreased metal part is allowed to air dry, and then sand blasted. Following sand blasting some of the blasting grit is found to contain trace amounts of solvent constituents. Since the customer degreased parts with a solvent that became an F001 listed hazardous waste once spent, is the sand blasting grit also an F001 listed hazardous waste?

A: Per an EPA memo dated August 30, 1991 ([RO 11638](#)):

"... traces of solvents left on equipment after cleaning are not spent and therefore do not meet the listing description.

If solvents are used for cleaning in excess of amounts needed for that purpose, however, the excess solvent residues could be spent, and therefore listed hazardous waste. No set quantity has been established for excess amounts of solvents which would cause the residual in question to be subject to regulation."

The memo goes on to state that as always, State agencies are allowed to have a more stringent interpretation than EPA.

SUMMARY:

- Per the USEPA, sand blast grit containing traces of solvent from degreased parts is not subject to the hazardous waste listings.
- Since the trace solvents are not interpreted by EPA as "spent" the sand blast grit cannot meet the F001 listing.
- The above is an EPA interpretation and States have the authority to interpret more stringently.

The August 30, 1991, 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: 9/15/16

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents

9444.1991(04)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RO 11638

AUG 30 1991

MEMORANDUM

SUBJECT: Residual Materials Contaminated with Trace Solvents

FROM: Sylvia K. Lowrance, Director, Office of Solid Waste

TO: Robert L. Duprey, Director, Hazardous Waste Management Division, EPA Region VIII

This memorandum is in response to your requests for guidance on trace solvent issues dated December 20, 1990 and February 11, 1991. In the particular case cited, a facility degreases metal parts in an F001-listed solvent, air dries the parts, and then blasts the parts. Some of the blasting grit has been found to contain solvent constituents. According to your first memo, a conflict between Region VIII and the Utah Department of Health has arisen on interpreting the scope of the listing regulations. The conflict appears to be centered on whether previous Headquarters memoranda are valid and applicable to this situation.

Upon review of the specific situation and your initial response, research into previous Headquarters correspondence, and discussions with your staff, we concur with the memorandum sent by Terry Anderson to James Wickemeyer on October 29, 1990 (i.e., the blasting grit generated by the facility in question does not meet the F001 spent solvent listing description). This letter is consistent with previous Headquarters interpretations as to the scope of the spent solvent listings or the mixture rule, which state traces of solvents left on equipment after cleaning are not spent and therefore do not meet the listing description. Such wastes may be hazardous because they exhibit one of the characteristics of hazardous waste described in 40 CFR 261 Subpart C (particularly the toxicity characteristic of §261.24).

If solvents are used for cleaning in excess of amounts needed for that purpose, however, the excess solvent residues could be spent, and therefore listed hazardous waste. No set quantity has been established for excess amounts of solvents which would cause the residual in question to be subject to regulation. The nature of facility operations will dictate whether the amount of solvent released, inadvertently or deliberately, would cause the waste in question to meet the listing description. The applicability of such an interpretation would depend on the nature of the operation, the quantities of solvents used and disposed in the operation, and the manner in which they are used/disposed.

Please note that some state agencies have the authority to interpret Federal regulations more strictly than EPA, if desired. In this particular case, such an interpretation may ease the regulatory flexibility of State agency personnel.

Thank you for your memorandum. If you have any additional questions on this topic please do not hesitate to call me or have your staff contact Ron Josephson at FTS 260-4770.

cc: (w/incoming) Ken Gigliello, OWPE (OS-520)
Hazardous Waste Division Directors, Regions I - VII, IX, X

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DATE: 9/15/16

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