

PPC 9444.1987(53)

F005 LISTING FOR PYRIDINE STILL BOTTOMS

Dec. 15, 1987

Mr. Verrill M. Norwood, Jr.
Director, Environmental Affairs
Olin Chemicals Group
P.O. Box 248
Lower River Road
Charleston, Tennessee 37310

Dear Mr. Norwood

This letter is in response to your June 3, 1987 letter, concerning your petition (#0381) to delist the pyridine still bottoms (EPA Hazardous Waste No. F005) generated from the Thermolin 101 process at your Lake Charles, Louisiana facility.

On May 25, 1987, we informed you of our intention to deny your delisting petition on the basis of predicted levels of pyridine, at the compliance-point, that exceed the regulatory standard for pyridine. On June 3, 1987, we received your letter withdrawing your petition. Your basis for withdrawal was the belief that the Agency's F005 listing is not appropriate for your waste. Specifically, you stated that pyridine is used as a catalyst and not as a solvent in your process and you contended, therefore, that the residue generated during reclamation does not constitute an F005 waste. Based on the information received to date, however, we believe that pyridine functions as a solvent in your process and that your recovery wastes are therefore accurately listed under EPA Hazardous Waste No. F005. The waste, therefore, should be considered hazardous and is subject to regulation under 40 C.F.R. Parts 262 through 265 and to the permitting standards of 40 C.F.R. Part 270.

Since you have withdrawn your delisting petition, my office will not investigate this topic any further. However, since the waste is hazardous, we are forwarding our files to appropriate Region VI officials.

In the future, if you decide to submit a new delisting

petition to the Agency, in addition to the information requested in the letter of May 26, 1987, you must provide the following information.

A complete description of the Thermolin 101 process.

A description of all process equipment involved in the Thermolin 101 process, including complete schematic diagrams.

A list of all materials used in the process and their functions.

A complete description of all reactions involved in the process. This should include a description of the most likely chemical mechanisms of the reactions.

Molar amounts (mass or volumetric amounts are also acceptable) of all materials used and generated in the process (including intermediates). Include a rationale for use of specific ratios of raw materials used in the process.

If you have any questions regarding this matter, please contact Scott Maid, or my staff at (202) 382-4783.

Sincerely,

Bruce R. Weddle, Director
Permits and State Programs Division

cc: Lee Haze, EPA Region VI
Bonny Romo, EPA Region VI
Bill Taylor, EPA Region VI
Bill Honker, EPA Region VI
Jim Anderson, Olin
Henry Huppert, SAIC