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SPENT SOLVENT LISTINGS & LEACHATE FROM SANITARY LFs THAT  
RECEIVED HAZARDOUS WASTE

Jun 10 1983

Dan Nelson  
Waste Management, Inc.  
3003 Butterfield Road  
Oak Brook, Illinois 60521

Dear Dr. Nelson:

In your letter of April 4, 1983, you requested that EPA confirm your interpretation of the RCRA hazardous waste regulations as they pertain to the spent solvent listings, and the status of leachate from sanitary landfills that have received hazardous waste. I trust that this letter adequately addresses your concerns.

As stated in your letter, the solvent listings (EPA Hazardous Waste Nos. F001-F005) pertain to spent solvents (i.e., solvents used for their solvent properties). Industrial process waste containing solvents, on the other hand, are not included in the solvent listings except to the extent that it is a mixture of a solid waste and a spent solvent. Thus, you are correct in stating that spent 1,1,1-trichloroethane generated from a cleaning process is considered EPA Hazardous Waste No. F002, while industrial process waste containing 1,1,1-trichloroethane as a contaminant are not listed spent solvents. These wastes, however, may be listed individually under Subpart D of the regulations.

Leachate from a sanitary landfill that has received listed wastes is also considered a hazardous waste. However, as you stated, leachate containing F005 listed solvents is only hazardous to the extent that it exhibits the characteristic of ignitability.

Should you have any questions, please feel free to give me a call at (202) 382-4770.

Sincerely yours,

RO 12118

Matthew A. Straus  
Manager  
Hazardous Waste Definition Program