

PPC 9444.1987(41)

INK FORMULATION WASTES AS BOTH K086 AND F001-005 WASTES

SEP 15 1987

Ms. Sharon Hillmer
Regulatory Coordinator
Colonial Printing Ink Corporation
180 East Union Avenue
East Rutherford, New Jersey 07073

Dear Ms. Hillmer:

This responds to your August 4, 1987, letter requesting clarification of the EPA Hazardous Waste Number for your waste from ink formulation. You are uncertain whether the spent solvents contained in the waste stream are included under the K086 listing, or also must be designated as an F001-F005 spent solvent.

As stated in an earlier phone conversation, there is no question that your waste meets the description for EPA Hazardous Waste Number K086 pursuant to 40 CFR 261.32. However, as the background document for the K086 listing (entitled "Background Document Resource Conservation and Recovery Act Subtitle C Identification and Listing of Hazardous Waste") states, ". . . if these solvents are used in ink formulation and are disposed of, they are considered hazardous wastes under the earlier listing as well as the present listing." Therefore, should your waste also meet the description for the F001-F005 spent solvent wastes, your waste must be designated as one (or more) of the F001-F005 hazardous wastes, as well as being designated as K086.

Absent the K086 listing, most wastes from ink formulation would be listed only as F001-F005 spent solvents, though not necessarily (not all K086 wastes contain the listed spent solvents, and therefore, would not be listed as such). However, the solvent listings do not address the constituents of concern in the ink formulation wastes (i.e., lead and hexavalent chromium). Therefore, the K086 listing is required to address these constituents of concern, and the F-listing is required to address the spent solvents when appropriate

In our initial discussions on the proper designation for your wastes, the assumption was that the K086 waste also contained spent F005 solvent constituents. If this was the case, both

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the K086 and F005 designations would be required. However, upon further investigation, it was ascertained that the solvent of concern is a mixture of cyclohexanone (an F003 solvent) and a naphtha solvent.

A solvent mixture containing cyclohexanone would be designated as F003 when spent only if, before use, the mixture contains only the solvents listed under F003, or a total of 10% or more (by volume) of the solvents included under the F001, F002, F004, and F005 listings. Because the cyclohexanone used in your process is mixed with only a non F001-F005 solvent, the waste cannot be designated as an F003.

Therefore, your waste would only be designated as K086, without a designation for the solvent constituents. The solvent designation is not included because the solvent, before use, does not meet the criteria for the F003 listing (not because the solvents are included in the K086 listing).

I hope this has clarified the classification of your waste. Should you have any questions or need further information, please feel free to call me at (202) 382-4805.

Sincerely,

Mitch Kidwell
Environmental Protection Specialist

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