

9441.1986(61)

AUG 18 1986

Mr. Randall F. Andrews
Industrial and Agricultural Chemicals, Inc.
Route 2
Box 521-C
Red Springs, North Carolina 28377

Dear Mr. Andrews:

This is in response to your letter of May 27, 1986, regarding the regulatory status of the spent pickle liquor that your company picks up and processes at your facility. First, I would like to apologize for my delay in getting back to you; I hope this has not caused you any problems. With respect to your specific request, I agree with Ms. Kneller and Brock of the RCRA/Superfund Hotline that the spent pickle liquor that is processed at your facility is not a solid and hazardous waste. In particular, the processing of the spent pickle liquor that occurs at your facility does not constitute reclamation, as that term is defined in the hazardous waste regulations. Rather, the spent pickle liquor is being used/reused (as defined in 40 CFR 261.1(c)(5)) and, therefore, accumulated) and is not subject to the hazardous waste rule.^{1/}

Please feel free to give me a call if I can be of any further assistance; my telephone number is (202) 475-8551.

Sincerely,

Matthew A. Straus
Chief
Waste Characterization Branch

1/ It should be noted that this regulatory interpretation reflects the Federal hazardous waste rules. The State of North Carolina may take a different interpretation; therefore, please contact the State for further information.

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