

9441.1989(55)

RCRA/SUPERFUND HOTLINE SUMMARY

OCTOBER 1989

7. Clarification of Spent Solvent Listing

A foam manufacturer uses 100% CFC - 11 (trichlorofluoromethane) in the production of flexible foam. The trichlorofluoromethane acts as a blowing agent by physically opening the foam cell. It is then released into the ambient environment and is captured by a vapor recovery system. Once collected, the spent trichlorofluoromethane is sent off-site for recycling. Should this material be managed as F002?

The spent trichlorofluoromethane is a solid waste because it is a spent material being reclaimed. In order for the spent trichlorofluoromethane to be considered F002, the trichlorofluoromethane must have been used as a solvent. The December 31, 1985 Federal Register (50 FR 53316) clarifies that "only solvents that are used for their 'solvent' properties - that is, to solublize (dissolve) or mobilize other constituents" would be covered by the F001 - F005 spent solvent listings. Specific examples include "solvents used in degreasing, cleaning, fabric scouring, as diluents, extractants and reaction and synthesis media." In the case of foam production, the trichlorofluoromethane is not being used to solublize or mobilize, rather, it is simply opening the foam cell by a physical mechanism. Therefore, the spent trichlorofluoromethane would not meet the F002 listing. Since the use of trichlorofluoromethane in this manner does not meet a hazardous waste listing, this spent material would be a hazardous waste under Subtitle C of RCRA only if it exhibits a hazardous waste characteristic under 40 CFR 261.21 - 261.24.

Source: Ron Josephson (202)475-6715
Research: Mary Beth Clary