

9554.1990(12)

## RCRA/SUPERFUND HOTLINE SUMMARY

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### 2. Point of Generation

Two process units, one producing a strong acidic solution with a pH less than 2.0 and another producing a strong basic solution with a pH greater than 12.0, are individually joined by short lengths of pipe to a common collecting pipe. These solutions, upon contact, neutralize one another. This co-mingled wastestream no longer exhibits the characteristic of corrosivity. Would this waste be considered hazardous and subject to land disposal restrictions or, due to its neutral status only be subject to RCRA Subtitle D regulation?

The facts as given show two hazardous wastes with the characteristic of corrosivity. The points of generation are both upstream of the combination in the common collecting pipes. These wastes are subject to the land disposal restrictions. Removing the characteristic of corrosivity by combining these wastes can satisfy the treatment requirement of deactivation set out in 40 CFR 268.42, Table 2. Dilution may not be appropriate if there are other treatment requirements for the waste matrices. See 55 FR 22549, 22659 (June 1, 1990) The commingled wastestream, if not otherwise hazardous, is not subject to any other Subtitle C regulations, including permitting.

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