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K001 LISTED WASTES FROM WOOD PRESERVING PROCESSES

Mr. Don B. Howard
C-K Associates, Inc.
11848 South Harrell's Ferry Road
Suite A
Baton Rouge, Louisiana 70816

Dear Mr. Howard:

This letter is in response to your November 6, 1984, request for an analytical method to determine the presence of creosote. Alan Corson referred to your letter to me, because I have been working with creosote regulations. In order to properly reply to your letter, I feel that some clarification is necessary.

K001 refers to wastes from wood preserving processes that use creosote and/or pentachlorophenol, which I presume is the case that you described. U051 refers to creosote as a commercial chemical product which is only considered as a hazardous waste if discarded or intended to be discarded. In other words, you will not have 4051 unless raw creosote is discarded.

As you may know, creosote is an extremely complex mixture of many compounds. The concentration distribution of these compounds varies depending both on reaction conditions and on the source of coal used. Unfortunately, we are aware of no single analytical method with which to determine creosote presence. Recent information indicates that following the procedure outlined in the footnote associated with creosote on Appendix III, is not a reliable indicator of the presence of creosote. EPA is presently working on a proposed rule to amend the hazardous waste regulations concerning creosote.

However, we are not concerned with creosote per se but rather, the toxic compounds that are present in creosote. I therefore, recommend you analyze for the toxic compounds identified as being present in K001 on Appendix VII. If any of these are present at the facilities you are concerned with, a potential hazard still exists. Analytical methods for these compounds are

provided on Appendix III of 40 CFR part 261. Refer to Test Method for Evaluating Solid Waste (SW-846), Second Edition; Test Methods 8100, 8250, and 8310.

I hope these recommendations will be off assistance. Please feel free to contact me again, if you have any questions at (202) 475-8990.

Sincerely,

Agnes M. Ortiz
Chemical Engineer
Methods Program, WH-562B

cc: Region VI