

RCRA, SUPERFUND & EPCRA HOTLINE MONTHLY REPORT
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1. Remediation of TNT-Contaminated Soil

The K047 hazardous waste listing covers pink/red water from trinitrotoluene (TNT) operations (40 CFR Section 261.32). Would pink/red water generated at a TNT production facility during the remediation of soil contaminated with TNT be within the scope of the K047 listing?

Pink/red water from soil remediation at a TNT production facility would be listed as K047 only if the contamination is attributable to the production of TNT. The K047 listing only covers waters generated from the production and formulation of TNT and TNT-containing products. These waters include, but are not limited to, TNT purification filtrates, air pollution control scrubber effluents, washwater from cleaning of equipment and facilities, and washwater from product washdown operations (e.g., the cleaning of loaded shells prior to packaging) (Background Document: Sections 261.31 and 261.32-Listing of Hazardous Wastes, November 14, 1980, p. 649). If, however, a TNT-containing product is simply sold, shipped, or used, but not manufactured at a facility, any wastewater resulting from the remediation of soil contaminated by the TNT product would not be regulated as K047 because the contamination is not associated with the production of TNT, but rather with post-production operations.