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United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

January 28, 1993

Dennis Redington
Director, Regulatory Management
Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167

Dear Mr. Redington,

Thank you for writing your letter regarding Monsanto products sold as hydraulic fluids and heat transfer fluids.

This is to confirm that although nonpolymer-based oils are not specifically discussed in the used oil management standards rule under the definition of used oil, it was the intent of EPA to include all synthetic oils that function similar to petroleum-based lubricants, oils, and surface agents in the definition of used oil. EPA believes that your hydraulic fluids and transfer fluids meet this criterion and will be regulated under 40 CFR 279 in lieu of Parts 260-272 of the hazardous waste program once the regulations become effective in the various states. We expect most states to adopt the rule over the next two to three years.

If you have any further questions please contact Bryan Groce at (202) 260-9550.

Sincerely,
Sylvia K. Lowrance, Director
Office of Solid Waste