

9441.1986(57)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MAY 86

6. Spent Solvents

A company uses methylene chloride to remove varnish from pieces of equipment. The varnish is stripped off in clumps and is collected in a container with the methylene chloride. The clumps of varnish are removed from the methylene chloride, and the methylene chloride is used again for more stripping. Would the clumps of varnish be a hazardous waste when disposed?

When methylene chloride is used as a solvent/stripper and becomes spent through use, then it is a listed hazardous waste, F002 (§261.31). When the clumps are removed from the methylene chloride (F002), they become a new solid waste. If intended for disposal, the clumps would be considered F002 because of the "derived from rule" in §261.3(c)(2)(i), which states that any solid waste generated from the treatment of a hazardous waste is still a hazardous waste. Once the clumps are removed, the once-spent methylene chloride would then be reclaimed and would no longer be regulated as F002.

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