

9441.1984(11)

RCRA/SUPERFUND HOTLINE SUMMARY

APRIL 84

RCRA/Superfund Hotline

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4. If equipment from drilling for crude oil or natural gas is steam-cleaned off-site from the drilling site, is the waste excluded from regulation by 261.4(b)(5) even if the waste exhibits a Subpart C characteristic?

Wastes uniquely associated with the exploration, development or production of crude oil, natural gas or geothermal energy are excluded from regulation by 261.4(b)(5) regardless of whether the waste exhibits a Subpart C characteristic. Since only water is used for steam-cleaning, the drilling waste is still excluded from regulation. If another cleaning agent not uniquely associated with the exploration, development, or production of crude oil, natural gas, or geothermal energy was used, then the waste could be subject to regulation. For example, if methylene chloride was used to clean the equipment, the waste would be subject to regulation as F002.

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