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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

"Skinner List"

1. What is meant by the term "Skinner List"?

The term "Skinner List" refers to a subset of 40 CFR 261 Appendix VIII constituents (89 compounds) that, when developed, was considered a conservative list of hazardous constituents that were reasonably likely to be in petroleum refinery wastes. The list was originally an attachment to a memo dated April 3, 1984, from John Skinner, then Director for the Office of Solid Waste, to the Regional Hazardous Waste Permit Branch Chiefs.

Its primary purpose was to provide permit writers guidance on evaluating petroleum refinery waste analyses submitted in land treatment permit applications. However, as a result of changes in delisting requirements as specified by the Hazardous and Solid Waste Amendments of 1984, the list became relevant for purposes of refinery delisting action including the identification of analyses to be performed for delisting purposes. (The list of constituents sent to petitioners actually differed slightly from the original list that appeared with the Skinner memo. The constituents appeared in a list entitled "Constituents of Possible Interest to Refinery Listing Effort.")

As a result of additional data collected by the Agency during the spring of 1985, the decision was made to eliminate a significant number of constituents for which analysis was needed for delisting purposes. That subsequently reduced list is the current one now in use for delisting purposes only. Regional offices retain the authority to require the complete "Skinner List" to be used in land treatment permit applications. In addition, the hazardous waste listing program at EPA headquarters may periodically add constituents to the listings as a result of data collected through their industry studies. The guidance manual entitled Petition to Delist Hazardous Waste contains the current list for which analysis is needed for refinery wastes in addition to general information described on preparing a delisting petition. This guidance manual can be ordered at a cost of \$19.00 through the National

Technical Information Service (NTIS) by referring to order number PS 85-194488.

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