

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JULY 27, 1993

Mr. H. David Bowes
Finish Thompson, Inc.
921 Greengarden Road
Erie, Pennsylvania 16501-1591

Dear Mr. Bowes:

Thank you for your letter of May 21, 1993, and the enclosed information describing your company's engine coolant recycling system. As you may know, environmentally protective recycling is an important part of the Environmental Protection Agency's waste management hierarchy of source reduction, recycling, and lastly, treatment and disposal.

With respect to federal plans for treatment of engine coolant, please find enclosed a copy of a proposed rule that we published on February 11, 1993, known as the "universal wastes" proposal (58 FR 8102). The proposal discusses a general approach for minimizing regulatory requirements for collection of "universal wastes," hazardous wastes that are generated by large numbers of generators in relatively small quantities and may not be readily amenable to management under the full hazardous waste regulations. Antifreeze was briefly discussed as a waste that may, at least in some cases, be hazardous and that might be addressed under such a system (see page 8109). Comment was requested on this issue. The Agency is at this time reviewing comments received on this proposal.

In addition, the issue of antifreeze recycling has been raised in the context of discussions being held by the Office of Solid Waste's Definition of Solid Waste Task Force, which is currently working on recommendations for future approaches to regulation of hazardous waste recycling. Also enclosed for your information is a short discussion paper on antifreeze that the Task Force distributed at their first public meeting in May.

As these projects move forward, I hope that we may contact you should we require further information on engine coolant recycling. If you have further questions about the universal wastes proposal, please call Charlotte Mooney, of my staff, at (202) 260-6926. If you have questions about the Task Force's activities, please call Marilyn Goode at (202) 260-6299. Thank you for your interest in environmentally protective recycling.

Sincerely,

Jeffery D. Denit

Acting Director,
Office of Solid Waste