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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 11 1988

Mr. A. J. Heinze
AJH Environmental Consulting, Inc.
843 Claymont Drive
Ballwin, MO 63011

Dear Mr. Heinze:

This is in response to your November 7, 1987, letter to Michael Petruska concerning the regulatory status of spent pipeline filter cartridges. The status of the cartridges depends on whether the solvents that pass through the filters meet one of the listing descriptions at 40 CFR Part 261, Subpart D.

If the solvent in question has been used and otherwise meets one of the "F" listings in Section 261.31, then the filters are hazardous waste under the "derived from" rule in Section 261.3(c)(2)(i). The filters would be hazardous waste unless a delisting is granted by EPA under Section 260.22.

If the solvent contained in the filter is a discarded commercial chemical product listed in Section 261.33(e) and (f), then the filters are contaminated with, or contain, a hazardous waste and must be handled as hazardous waste until it no longer contains the hazardous constituent.

From the information you have provided, it appears that your client has filters in both categories. As such, the filters are subject to the regulations at 40 CFR Part 261-268, Part 270, and the notification requirements of RCRA Section 3010.

If you have further questions, please continue to deal with Michael Petruska at (202) 475-8551.

Sincerely,

Original Document signed

Marcia E. Williams
Director,
Office of Solid Waste

RO 11325