

PPC 9442.1991(18)

USED AUTOMOBILE ANTIFREEZE DISPOSAL

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

DEC 19 1991

Honorable Slade Gorton
United States Senate
Washington, D.C. 20510

Dear Senator Gorton:

Thank you for your letter of November 3, 1991, regarding Chuck Burr's concerns about the disposal of used automobile antifreeze.

My staff contacted Mr. Burr to discuss his concerns regarding a recent revision to our toxicity test and to the regulations that identify wastes as hazardous. Mr. Burr indicated that there is a lack of guidance for businesses in managing their antifreeze. We supplied him with information about the current regulations and exemptions regarding the disposal of antifreeze. I have also enclosed some guidance documents that the Environmental Protection Agency (EPA) has developed for small businesses to make it easier to comply with the Resource Conservation and Recovery Act.

It should be noted that EPA does not regulate household-generated antifreeze. In the case of antifreeze generated by businesses, EPA regulates only antifreeze that fails the revised toxicity test. It may be of interest to you that we have received some information from used automotive antifreeze recyclers and the used antifreeze collection industry, indicating that used antifreeze may, in some cases, fail the revised toxicity test and therefore be a hazardous waste.

In addition, EPA allows businesses that generate less than 100 kg/month (about 30 gallons) of hazardous waste to manage their wastes without complying with the EPA hazardous waste regulation. We are considering further special exemptions so that small business owners can comply more easily. We expect to propose this concept within the next few months.

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