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1. K051 and HSWA

Section 3004(q)(2)(A) of the Hazardous and Solid Waste Amendments of 1984 (HSWA) states that the provisions regulating hazardous waste used as fuel "shall not apply to petroleum wastes containing oil which are converted into petroleum coke at the same facility at which such wastes were generated ...unless the coke product exhibits a characteristic of hazardous waste." Does this mean that K051 (API Separator Sludge) could be revised on-site to produce new petroleum coke?

Yes; this means that coke produced from the on-site reuse of K051 (or any other listed petroleum refinery waste) is exempt from the labeling provisions of §3004(r) and any standards applicable to hazardous waste fuel, unless the coke product exhibits a characteristic of hazardous waste.