

9441.1986(23)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 21 1986

Mr. Thomas J. Jackson
Thorp, Reed, and Armstrong
One Riverfront Center
Pittsburgh, Pennsylvania 15222

Dear Mr. Jackson:

This is in response to your letter dated, February 28, 1986. In your letter, you requested an interpretation of the Federal hazardous waste rules concerning a mixture of methanol and a non-hazardous waste which does not exhibit the ignitability characteristic. Under the Federal hazardous waste rules, this mixture would not be defined as a hazardous waste, provided the waste does not exhibit any of the other hazardous waste characteristics (i.e., corrosivity, reactivity, and extraction procedure (EP) toxicity). In particular, a mixture of a characteristic hazardous waste, including wastes that are listed solely because they exhibit one or more of the hazardous waste characteristics and a solid waste is not hazardous if the mixture does not exhibit any of the hazardous waste characteristics. In the example described in your 1/ letter, methanol (a hazardous waste due to its ignitability) is mixed with a non-hazardous wastestream; the resulting mixture is no longer ignitable. Therefore, this mixture would not be considered hazardous (as long as the waste does not exhibit any of the other hazardous waste characteristics) under the Federal hazardous waste rules (i.e., a delisting petition is not necessary). States, however, may have rules that are more stringent or broader in scope than the Federal rules. Therefore, this waste remains hazardous under Pennsylvania law, unless it is exempted in accordance with State law.

1/ If the methanol is being used as a solvent, the spent methanol would be defined as EPA Hazardous Waste No. F003.

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Please feel free to give me a call at (202) 475-8551 if you have any further questions.

Sincerely,

Matthew A. Straus
Chief
Waste Identification Branch

cc: Bob Allen, EPA Region III
David Freidman, Pennsylvania Department of Natural Resources

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