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MAY 30 1986

George W. Rambo, Ph.D., R.P.E.
Director, Research, Education,
and Technical Resources
National Pest Control Association, Inc.
8100 Oak Street
Dunn Loring, VA 22027

Dear Dr. Rambo:

Thank you for your letter of May 16, 1986, requesting an interpretation of the applicability of the hazardous waste regulations to washwaters generated from washing the exterior of trucks and service vehicles.

As you are aware, in a July 22, 1985 memorandum to our Region VI office, we indicated that washwaters generated by washing the exterior of an aerial pesticide applicator's airplane would not be considered hazardous via the mixture rule. See enclosure.) Since the Agency sees no difference between washwaters from aerial versus ground application equipment, it is logical that the interpretation issued in July 1985 should also extend to these washwaters from ground equipment.

Consequently, this rinsewater would not be considered a hazardous waste under the mixture rule and would only be considered hazardous if the rinsewater exhibited one of the characteristics of a hazardous waste identified in Subpart C of Part 261 (i.e., ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity).

If you have any further questions on this matter, please do not hesitate to contact Matt Straus at (202) 475-8551.

Sincerely,

Marcia E. Williams
Director
Office of Solid Waste

RO 11160

-2-

cc: Air and Water Management Division Directors (I-V and VII-X)
Air and Waste Management Branch Chiefs (I-X)
S. Scatzow
P. Gray
B. Weddle
J. Lehman
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