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MAY 88

1. Hazardous Waste Identification - K111 Listing

During the production of TNT (trinitrotoulene), DNT (dinitrotoulene) is generated as an intermediate chemical via nitration of toulene. Does the K111 listing (i.e., product washwater from the production of dinitrotoulene via the nitration of toulene) cover the product washwaters generated from this intermediate step or does the listing only cover those product washwaters generated from final product DNT?

Product washwaters produced from the intermediate DNT chemical are included in the K111 listing. The October 23, 1985 Federal Register (50 FR 42937) states that the K111 listing includes "any wastes which meet the waste description and are generated by the processes described in the background document, regardless of the end product or industry in which it takes place." In fact, 50 FR 42937 specifically states "product washwaters from the production of DNT by nitration of toluene, as an intermediate to TNT production, also are covered by this listing."

Source: Bob Scarberry (202) 382-4769
Research: Sue Brugler