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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 24 1990

Mr. John Randall
Hi-Tech Industries, Inc.
17029 Devonshire Street, #124
Northridge, California 91325-1679

Dear Mr. Randall:

This is in response to recent inquiries by yourself and Mr. Travis Cutter of your company concerning the regulatory status of spent anti-freeze coolant (specifically, ethylene glycol). If this material is intended for disposal, it is regulated as a "solid waste" by the Resource Conservation and Recovery Act (RCRA).

Per authority provided by RCRA, EPA has developed a Federal regulatory scheme for the proper treatment, storage, and disposal of hazardous waste, a subset of solid waste. These hazardous waste regulations may be found in the Code of Federal Regulations, Title 40, Part 261 (40 CFR 261).

The waste anti-freeze you have described is not listed as a hazardous waste under EPA's hazardous waste regulations (40 CFR 261, Subpart D). However, as a generator of a solid waste, you are obligated to determine either from knowledge of the waste coolant or by appropriate testing, whether the waste exhibits any of four characteristics, namely ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity. EPA has anecdotal information that spent anti-freeze often contains lead levels sufficiently high to classify the waste as EP toxic.

If your waste coolant fails to exhibit one or more of the hazardous waste characteristics, then your waste is deemed to be a nonhazardous, solid waste by Federal regulations. You should, however, inquire about State and local regulations that may apply to your waste anti-freeze.

We appreciate your efforts to dispose of these wastes responsibly. If you have any further questions about Federal regulations applicable to this antifreeze, please contact the RCRA/Superfund Hotline at (800) 424-9346.

Sincerely,

David Bussard
Director
Characterization and
Assessment Division