

9483.1983(04)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

SEPTEMBER 83

An activated carbon filtration unit is attached to a hazardous waste storage tank vent pipe to capture the waste vapors. Is this filtration unit considered a treatment unit subject to permitting?

The activated carbon filtration unit is viewed as an appurtenance to the storage tank and is not looked at individually during permitting. The carbon filtration unit is treating a hazardous waste and RCRA has jurisdiction over its activity. The carbon would be a solid waste when discarded and a hazardous waste if it exhibited a characteristic or if it contained a listed waste. The permit would be issued for the tank simply for storage.

Source: Dave Fagan