

9443.1989(02)

WASTE SOLVENT-BASED GLUE

APR 12 1989

Mr. John P. Stockli
White, Osterman, and Hanna
One Commerce Plaza
Albany, NY 12260

Dear Mr. Stockli:

This is in response to your letter of March 27, 1989, in which you asked about the regulatory status of waste solvent-based glue. Specifically, you wished to know whether or not the F-listings (40 CFR 261.31) apply to characterization of waste dried or non-solidified glue.

The spent solvent waste codes (F001 - F005) apply only to solvents that are used for their solvent properties. See 50 FR 53316 (December 31, 1985). These listings do not apply to solvent-containing products that may become wastes if the solvents are ingredients, such as for paint or glue. However, the waste glue could meet one of the hazardous waste characteristics, especially if it is in the non-solidified form. (See 40 CFR 261.20 - 261.24.) The generator is responsible for ascertaining whether the waste exhibits one or more of these hazardous characteristics. In addition, the generator should review state regulations, which may be more stringent than Federal regulations.

Thank you for your inquiry. If you have any further questions, please contact Ron Josephson of my staff at (202) 475-6715.

Sincerely,

Devereaux Barnes
Director
Characterization and
Assessment Division

RO 13273