

PPC 9444.1987(49)

REACTOR VESSEL WASHOUT CONTAINING TRACE AMOUNTS
OF SOLVENT

OCT 26 1987

Ronald J. Senna
Director - Environmental Compliance
International Flavors and Fragrances, Inc.
800 Rose Lane
Union Beach, N.J. 07735

Dear Mr. Senna:

This is in response to your letter of September 25, 1987, concerning the regulatory status of your fragrance ingredients. Based on the information you provided and the subsequent phone conversation with our consultant, Geo/Resource Consultants, Inc., EPA's understanding of the waste generation process is that Acetone, ethyl acetate, and xylene solvents are periodically used to clean out the reactor vessel. The spent solvents generated from the cleaning operation are drummed and sent off site for proper management as F003 wastes. A light coating or residue consisting of fragrance oils and trace amounts of solvent remains on the walls of the vessel. IFF then washes the vessel out with soap and water. This waste washwater carrying the oil and solvent residue then flows to an oil/water separator for treatment.

Based on this scenario, the Agency's interpretation is that the solvent-contaminated washwater is not within the scope of the Hazardous Waste No. F003 listing for spent nonhalogenated solvent. The subject waste stream is generated from the washout of a reactor vessel containing residues of solvent and fragrance oils. Therefore, the waste is not spent solvent, but a process wastewater contaminated with solvent constituents. This waste is very different from a solvent stream that has been used and as a result of contamination can no longer be used as a solvent without further processing (see Section 261.2(c)(1) and 50 FR 53316). It is not the Agency's intent to regulate water from washout of a reactor vessel as F003.

-2-

If the washwater sent to the oil/water separator is ignitable, it would be classified as a D001 hazardous waste, and would remain as such for as long as it exhibits the ignitability characteristic. According to 40 CFR Section 261.3(c) and (d), any residues resulting from treatment of D001 are hazardous wastes only if they continue to exhibit a characteristic found under 40 CFR, Part 261, Subpart C.

If you have further questions in this area, please contact Michael Petruska of my staff at (202) 382-7729.

Sincerely,

Original Document signed

Marcia E. Williams
Director
Office of Solid Waste

cc: Kurt Whitford, N.J. DEP
Sam Ezekwo
EPA Region II
Air and Hazardous Waste Division

RO 13066