

9443.1985(07)

September 18, 1985

WATER/METHANOL MIXTURE WASTESTREAM

Mr. John Polich, P.E.  
Gabriel and Associates  
1814 North Marshfield  
Chicago, Illinois 60622

Dear Mr. Polich:

I am responding to your letter of July 18, 1985 requesting clarification of the RCRA permit requirements that apply to a specific wastewater stream, which is a mixture of methanol and water, and which possesses the following characteristics:

Volume (30,000-50,000 gpd)  
5-day BOD (25,000 mg/L)  
Suspended solids (300 mg/L)  
Methanol (20,000 mg/L)

This wastewater stream is a listed RCRA hazardous waste (EPA No. F003) under 40 CFR §261.21. Since the waste is listed for the characteristic of ignitability and because it is a mixture of a solid and hazardous waste (§261.3(a)(2)(iii)), it can only be exempted from all RCRA requirements if you can demonstrate that the waste is not ignitable. To make this demonstration, you must follow the procedures in §261.21 using a representative sample of the wastewater stream. If your waste is not ignitable, as a result of analysis according to these test methods, you should notify Mr. Horst Witschonke, Chief of the Illinois RCRA Unit, U.S. EPA Region V at (312) 886-0987. He will evaluate the test data and consider exempting the waste from RCRA regulations.

Another option is to seek approval from the local POTW, which has an NPDES permit, and which meets all the other requirements of 40 CFR §270.60(c) for a RCRA permit-by-rule, to accept your hazardous waste. The POTW could allow you to pipe the wastewater stream directly into a sewer, pipe, or other similar conveyance at the point of generation, or to discharge the waste at the POTW. In the latter case, the hazardous waste must continue to be manifested and transported according to the

RCRA requirements of 40 CFR Part 262.

Finally, you should be aware of a new RCRA requirement (Section 3005(h)) mandated by the Hazardous and Solid Waste Amendments of 1984 requiring the owner or operator of an on-site RCRA facility to certify that he has a program in place to reduce the volume of quantity and toxicity of hazardous waste generated. (See 50 FR 28733-34, July 15, 1985.) To comply with this requirement, I recommend that you consider reclaiming or recycling the spent methanol in the wastewater (see 50 FR 616-668, January 4, 1985 for the definition of hazardous waste recycling activities).

If you have any additional questions on these permitting issues, please call Nancy Pomerlean at (202) 382-4500.

Sincerely,

Peter Guerrero, Chief  
Permits Branch

cc: Art Glazer  
Bob Scarberry (WH-562B)  
Horst Witschonke, Region V