

PPC 9441.1984(10)

MAY 15 1984

Lloyd R. Cress
Greenebaum, Doll & McDonald
1400 Vine Center Tower
P.O. Box 1808
Lexington, Kentucky 40593

Dear Mr. Cress:

In your letter of April 26, 1984, you requested confirmation of our earlier discussion regarding the regulatory status of residue from stream-stripping of process waste containing toluene.

As I explained in our recent conversation, the solvent listings (EPA Hazardous Waste Nos. F001-F005) pertain to the pure form or technical grade solvent, when spent or discarded. The listings do not pertain to industrial process waste containing solvents. Since process wastewater generated from your client's facility, is not the listed hazardous waste, the residue from treatment (i.e., stream-stripping) of the waste is also not a hazardous waste, unless it exhibits one or more of the characteristics of hazardous waste (i.e., ignitability, reactivity, corrosivity or EP toxicity).

I trust that this letter adequately responds to your inquiry. Should you require additional information, please call me at (202) 382-4807.

Sincerely,

Jacqueline W. Sales
Environmental Engineer

WH-562:JSALES:ld:382-4807:S-248:5-11-84:Disk VC05 doc. 9

RO 12234