

9441.1987(26)

CLEAN SOLVENT FROM RECYCLED SOLVENT-CONTAINING WASTE-  
STILL BOTTOMS

APR 17 1987

Ms. Sue Vedantham  
Environmental Engineer  
Solvent Service, Inc.  
1021 Berryessa Road  
San Jose, California 95133

Dear Ms. Vedantham:

This letter responds to your March 18, 1987, correspondence requesting a written statement addressing the regulatory status of "clean" solvent from recycled solvent-containing wastes that are subject to the land disposal restrictions.

According to the provisions in 40 CFR 261.3(c)(2)(i), "materials that are reclaimed from solid wastes and that are used beneficially are not solid wastes and hence are not hazardous wastes under this provision unless the reclaimed material is burned for energy recovery or used in a manner constituting disposal." Therefore, the clean solvent from your recovery process is not a solid waste, and as such, is not a hazardous waste which is subject to the land disposal restrictions. However, the still bottoms from the recovery of spent solvents are hazardous wastes listed in 40 CFR 261.31. For example, the recycling of spent carbon tetrachloride from a metal cleaning operation results in "clean" carbon tetrachloride solvent that may be sold as a product or otherwise reused and still bottoms which remain listed hazardous wastes and subject to the land disposal restrictions.

If you have additional questions, you may call me at (202)382-4770.

Sincerely,

Jacqueline W. Sales, Chief  
Regulation Development Section

RO 12911