

9441.1985(07)

FEB 13 1985

L.A. Whittig, Ph.D.
Supelco, Inc.
Bellefonte, PA 16823-0048

Dear Dr. Whittig:

Thank you for your letter of January 21, 1985, and your further telephone conversation with Dr. Judith Bellin, of my staff, on January 28. As you state in your letter, your company is a commercial manufacture of capillary columns used in gas chromatography. As part of quality control considerations, you indicated a need to test these columns with a dioxin standard prior to sale. As a result, you generate a waste (primarily activated carbon) containing 700 nanograms of a mixture of seven tetrachloro dioxin isomers per year. In addition, you also indicated that you generate between 1 to 2 grams of both 2, 4, 6,-trichlorophenol and pentachlorophenol from similar activities (i.e., production of chromatographic columns and analytical standards). As a generator of these wastes, you question whether these wastes would be covered under the recently promulgated dioxin regulations published in the Federal Register on January 14 (see attachment).

Upon our review, we believe that these wastes are not covered by the dioxin rulemaking since these wastes (as well as most laboratory wastes) do not result from the manufacturing processes described in the rule. Therefore, you are not required to comply with the dioxin rule. However, due to the hazardousness of these wastes, we would strongly encourage you to manage these wastes very carefully. They should not be mixed with other hazardous wastes, since these could contain solubilizing solvents. Please give me or Dr. Bellin a call if you have any further questions. We can be reached at (920) 475-8551.

Sincerely,

Matthew A. Straus, Chief
Waste Identification Branch (WH-562B)

RO 11055

cc: Judith S. Bellin