

"Unused Formulations of Agent Orange"
(Key Words: Commercial chemical product; hazardous waste
definition; F027)

QUESTION: During the Vietnam War an estimated 44 million pounds of the herbicide Agent Orange were formulated for use as a defoliant. Currently there are several United States military posts in possession of unused formulations of this herbicide. Upon disposal, would the herbicide Agent Orange be regulated as a hazardous waste under RCRA Subtitle C?

ANSWER: Unused formulations of Agent Orange would meet the F027 hazardous waste listing when disposed of. The active herbicidal components of Agent Orange are equal quantities of 2,4-dichlorophenoxyacetic acid (2,4-D) and 2,4,5-trichlorophenoxyacetic acid (2,4,5-T), which are both derived from the synthesis of chlorophenols and chlorophenoxy compounds. The listing description of F027 includes discarded unused formulations containing compounds derived from tri-, tetra-, or pentachlorophenol. Since Agent Orange contains a compound derived from the synthesis of trichlorophenol (i.e., 2,4,5-T), it is appropriately classified as F027 upon disposal. (June 1993 Monthly Hotline Report)