MEMORANDUM

SUBJECT: Mehanol Recovery System; Clarification of Waste Status

FROM: Matthew A. Straus
        Chief, Waste Characterization Branch

TO: Clifford Ng, Engineer, Region II, AWM-HWF

This is in response to your memo of February 18, 1987, in which you request our interpretation of the waste streams associated with a specific methanol recovery process. First, I apologize for taking so long in responding to your request. I hope this delay has not caused you any problems.

With respect to your specific questions, the following is our interpretation of how this process is regulated under the hazardous waste rules:

1. Stream A, the methanol-laden air from the drying and granulation step of the process, does not meet the definition of a solid waste under RCRA because it is in vapor form and not confined in a container.

2. The carbon beds that both condense and adsorb the methanol from the air contains an F003 waste when the condensation of methanol occurs. Therefore, stream B, the carbon/methanol mixture is to be handled as a listed hazardous waste.

3. The solvent stripper is used to recover the spent carbon. Therefore, this process is not subject to regulation. See 40 CFR 261.6(c)(1). However, any residues (stream C) derived from it is considered an F003 waste. The spend carbon, which is the recovered product, is not a solid waste.

4. Stream C, the condensed steam/methanol mixture is a hazardous waste because it was derived from treating a hazardous waste (see 40 CFR 261.3(c)(2)(i)) and stream C would remain a hazardous waste, unless it is delisted under the provisions of 40 CFR Sections 260.20 and 260.22 or is mixed with another solid waste (see 40 CFR 261.3(a)(2)(iii)).
5. Since stream C is hazardous (unless it is delisted or has been mixed with a solid waste), then downstream tank 4 would be subject to RCRA hazardous waste regulations. Stream F is also derived from the treatment of a hazardous waste and, therefore, would be a hazardous waste. As you are aware, if stream F were sent to a POTW or discharged under an NPDES permit, then it would not be subject to RCRA regulations.

I hope this clarifies your concerns about the waste streams from this process. If you require additional information, please feel free to call Ed Abrams at FTS-382-4787.