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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MARCH 87

2. Solvent Mixture Rule

How will the following mixtures be classified under RCRA?
The concentrations of the various components before use are indicated below.

1) Solvent containing 15% xylene (F003), 15% toluene (F005) and 70% water.

2) Solvent containing 80% xylene (F003), 5% methylene chloride (F001) and 15% water.

3) Solvent containing 80% xylene (F003) and 20% water.

The preamble of the "Solvent Mixture Rule" published in the Federal Register on December 31, 1985 (50 FR 53315) states that since the Agency has not evaluated the F003 solvents for their toxicity, and no determination could be made as to the ignitability of an F003 mixture, the 10% threshold applies to them in modified form. According to the Solvent Mixture Rule, mixtures containing F003 solvents are covered under the listings only under two conditions: 1) the mixture contains only F003 constituents, or 2) the mixture contains one or more F003 constituents and 10% or more of the other listed solvents prior to use.

Therefore, the first mixture when spent would be a listed hazardous waste under RCRA. For the purposes of notification and manifesting, the generator would designate this waste as F005/F003.

The second mixture is not a listed waste because the methylene chloride (F001) concentration prior to use is less than 10% and it contains other constituents other than F003. This mixture, however, will probably be ignitable and therefore classified as D001.

The last mixture is not a listed waste unless it is considered to be a commercial or technical grade xylene solution. If it is not technical or commercial grade, the mixture should be tested for

the characteristic of ignitability.

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