

9441.1986(05)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 16 1986

Mr. John Slemmer  
Environmental Manager  
Solid Tek Systems, Inc.  
5371 Cook Road  
P.O. Box 888  
Morrow, Georgia 30260-0888

Dear Mr. Slemmer:

This is in response to your letters dated November 27 and December 27, 1985, concerning the identification of residues generated from the treatment of hazardous wastes. In particular, you ask whether the identification numbers that go on the manifest that accompanies the treated waste should be based on the hazardous waste characteristics of the treated waste, the composition of the treated waste, or both.

The answer to this question depends both on which wastes are being treated and the characteristics of the treatment residue. If the TSD facility is treating only characteristic hazardous wastes, the identification number that goes on the manifest for the treatment residue would be that number that is assigned to the characteristic for which the waste still exhibits (i.e., if the treated waste exhibits the characteristic of ignitability, the identification number would be D001). Of course, if the treatment residue no longer exhibits any of the characteristics of hazardous waste, the waste would no longer be hazardous and subject to Subtitle c control. If, on the other hand, the treatment facility treats both listed and characteristic hazardous wastes or just listed hazardous waste, the identification number that goes on the manifest for the treatment residue would be that of the untreated listed waste and that number that corresponds to the characteristic for which the waste exhibits, if any. Thus, in the example provided in your letter, you are correct that the identification number for the treated residue is U012. You are also correct that the TSD becomes a generator of the treated waste.

RO 11122

-2-

I hope this adequately responds to your request. If I can be of any further assistance, please feel free to give me a call at (202) 475-8551.

Sincerely,

Matthew A. Straus  
Chief  
Waste Identification Branch (WH562B)