

PPC 9441.1984(27)

DIBUTYLtin DIFLUORIDE NOT A LISTED RCRA HAZARDOUS WASTE

SEP 20 1984

Mr. Don Stanley  
Chemical Waste Management, Inc.  
Route 1, Box 7  
Harrisville, VW 26362

Dear Mr. Stanley:

This will confirm our telephone conversation of August 20, 1984, regarding the RCRA regulatory status of dibutyltin difluoride. You wanted to know about protective clothing contaminated with the raw product and baghouse dust collecting unused product.

Dibutyltin difluoride is not a listed RCRA waste. It is the generator's responsibility to test or apply knowledge of the material in order to determine whether, as a waste, it exhibits any of the 40 CFR Part 261 Subpart C characteristics. The Material Data Safety Sheet and the Ohio EPA analysis of product appear to confirm your decision that a waste contaminated with dibutyltin difluoride would not be hazardous waste on the basis of the dibutyltin difluoride.

Of course, the 44 States and territories that have instituted hazardous waste program that operate in lieu of RCRA may have a different viewpoint, especially in view of the TLV. In any case, you and your customer should be aware of the regulatory standards of any States you deal with. The RCRA/Superfund hotline (800/424-9346) can send you a list of the State hazardous waste agency addresses and phone numbers if you need it.

Sincerely yours,

Alan S. Corson  
Chief  
Studies and Methods Branch

RO 12312