

9444.1987(33)

AUG 7 1987

Mr. William S. Harer
CHEM-CLEAR
992 Old Eagle School Road
Suite 915
Wayne, PA 19087

Dear Mr. Harer:

This is response to your letter of May 12, 1987, in which you requested an interpretation regarding the regulatory status of a waste generated by one of your clients. Specifically, the waste in question is generated by caustic rinsing metal parts that have been cleaned with a solvent containing over 10%, by volume, trichloroethylene.

The Agency does not consider small amounts of solvent carried over on the metal parts from solvent degreasing to meet the listing description of a spent solvent. Therefore, if any solvent is carried over into the caustic rinse water, the mixture rule would not be applicable. Thus, the caustic rinse water would only be hazardous waste if it exhibits one of the hazardous wastes characteristics [ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity]. Since your caustic rinse water does not exhibit any of the hazardous waste characteristics, as was demonstrated by your client's analytical results, the caustic rinse water would not appear to be a hazardous waste under the Federal hazardous waste regulations. However, you should be aware that the State's hazardous waste regulations may be more stringent than the federal hazardous waste rules. Therefore, you should contact a representative from the State to determine the waste's regulatory status under the State's hazardous waste program.

If you require additional information, please contact Ed Abrams at (202) 382-4787.

Sincerely,

Matthew A. Straus
Chief, Waste Characterization Branch

RO 11283