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SOLAR CELL AND HIGH TECH INDUSTRIES HAZARDOUS WASTE

MEMORANDUM

RE:WCBLG2016

Subject: Hazardous Wastes from Solar Cell
and High Tech Industries

From: John Skinner, Director
Office of Solid Waste (WH-562)

To: Leland Modesitt, Director
Office of Legislation (A-103)

In response to your inquiry for follow-up with Senator Burdick's staff, the production of solar cells and other high technology devices (transistors, integrated circuits), involves a variety of manufacturing processes and can include the use of industrial solvents and metal treatment. Hazardous wastes generated from these operations include electroplating wastewater treatment sludges that contain cyanides and heavy metals that are toxic or reactive; spent solvents that are toxic or ignitable; and discarded commercial chemical products or manufacturing chemical intermediates that are also toxic or reactive.

However, this does not mean all wastes generated from the production of high technology devices should be considered hazardous. The determination as to whether or not a waste is considered hazardous is made in one of two ways. In one case, the Agency has listed certain wastes as hazardous under 40 CFR 261, Subpart D (§261.31 wastes from non-specific sources; §261.32-wastes from specific sources; §261.33-discarded commercial chemical products). In another case, a waste is hazardous if it exhibits one of the characteristics of a hazardous waste (i.e., ignitability, corrosivity, reactivity, and EP toxicity). Under 40 CFR 261 Subpart C, each generator is responsible for determining whether his waste exhibits any of these characteristics. If the waste exhibits a hazardous waste characteristic or is a listed waste, the facility will be deemed a generator of hazardous waste, and the waste must be

managed in accordance with the hazardous waste management regulations.

If you have any further questions on this matter, please do not hesitate to contact Alan Corson or Matthew Strauss, of my staff, at 382-4770 at any time.