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Laura Belden  
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Oklahoma City, Oklahoma 73106

Dear Ms. Belden:

This is in response to your letter of May 12, 1989 to Joshua Sarnoff of the Office of General Counsel. You requested that EPA clarify an April 1987 Hotline report on 1,1,1-trichloroethane (TCA) contained in a sand-metal-solvent mixture, created from degreasing metal parts in TCA, grinding the parts, and filtering the cooling fluids. EPA continues to believe that this waste stream does not meet the F001 listing description.

The sand-metal-solvent mixture is a process waste stream contaminated with solvent, not a spent solvent waste or a mixture of wastes with spent solvents. The Agency clarified the scope of the spent solvent listings on December 31, 1985 (50 FR 53316), and clearly indicated that listed spent solvent wastes do not include such process wastes. Further, unless these process wastes are characteristically hazardous (see 40 CFR 261.20 - 261.24), the waste minimization certification of RCRA Section 3002(b) does not apply. Please be aware that states may have more stringent hazardous waste regulations.

Thank you for your inquiry. If you have any further questions, please contact the RCRA/Superfund Hotline at (800)424-9346.

Sincerely,

Devereaux Barnes  
Director  
Characterization and  
Assessment Division

RO 11440