

9553.1988(02)

PROCESS WASTEWATER FROM METAL DEGREASING OPERATIONS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 8 1988

Ms. Mary Elizabeth Slevin
Lombardi, Reinhard, Walsh,
and Harrison, P.C.
5 Computer Drive West
Albany, NY 12205

Dear Ms. Slevin:

This is a response to your January 21, 1988 letter to the Office of Solid Waste in which you request an interpretation concerning the regulatory status of a process wastewater. The waste of concern is a rinsewater containing some carried-over 1,1,1-trichloroethane from a metal degreasing operation.

As you have described the operation, the solvent-contaminated water in the rinse tank constitutes a process waste and not a spent solvent. (See Hazardous Waste Listing Background Document, p. 81, May 1980; letter from Steve Silverman to Michael Rodbury, December 16, 1982.) This process waste would be considered hazardous only if it were determined to exhibit one or more of the hazardous waste characteristics; namely, ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity. (See 40 CFR 261.20-261.24.)

In your letter, you also mention an exemption that exists regarding solvent-water mixtures containing less than one percent organic solvents. You appear to be confusing two different regulations. This particular provision applies to wastes that are hazardous and therefore, subject to the land disposal restrictions rule. Under the land disposal restrictions (specifically, 40 CFR 268.30(c)(3)), spent solvent hazardous wastes that contain less than one percent total F001-F005 solvent constituents are subject to a two-year extension of the effective date based on insufficient capacity. The solvent wastes covered by the extension include solvent-water mixtures. Also, at 40 CFR 261.3(a)(2)(iv)(B) there is an exemption for solvent-contaminat-

ed wastewaters that are managed in units subject to regulation under Sections 307(b) or 402 of the Clean Water Act. To qualify for this exemption, the maximum total weekly usage of the 1,1,1-trichloroethane discharged to the wastewater must be less than 25 parts per million of the average weekly flow of wastewater into the headworks of the facility's wastewater treatment or pretreatment system. However, since your waste is not a spent solvent, neither of these exemptions would apply.

If you have any further questions, please contact Ron Josephson on my staff at (202) 475-6679.

Sincerely,

Original Document signed

Jeffery D. Denit
Acting Director
Office of Solid Waste