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OCT 23 1985

Ms. Carlene Bassell, P.E.
Manager, Environmental Technology
Lederle Laboratories
Division of American Cyanamid Company
Pearl River, New York 10965

Dear Ms. Bassell:

This letter is in response to your letter, dated October 10, 1985, and with regard to our telephone conversations concerning the regulatory status of reclaimed methanol produced at Lederle Laboratories and sent to American Cyanamid. As your letter describes, Lederle Laboratories generates a spent solvent (methanol) as part of their pharmaceutical manufacturing operations; this solvent is reclaimed on-site to a minimum of 99.5 percent purity. The reclaimed methanol is then sent to American Cyanamid at their Willow Island facility; the Willow Island facility used methanol in various manufacturing processes. However, the methanol must be reclaimed before it is used for a number of reasons (i.e., methanol sometimes has too much color for direct use). The question you raise is whether the methanol reclaimed by Lederle Laboratories and sent off-site to American Cyanamid is a commercial chemical product or a waste. You believe (based on discussions with Mr. James Ginley of the RCRA/Superfund Hotline) that Lederle's reclaimed methanol is a commercial chemical product and therefore, not subject to the Subtitle C regulations.

I agree; that is Lederle's reclaimed methanol is a product, not a waste. Although the methanol that is sent to American Cyanamid needs to be reclaimed before it can be used and normally such materials are still defined as wastes (see 50 FR 633; January 4, 1985), we believe Lederle's reclaimed methanol (with a purity of 99.5 percent) is more product-like than waste-like. This is analogous to the situation of reclaimed metals that only have to be refined before they are used. See 50 FR 634; January 4, 1985.

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Therefore, Lederle's reclaimed methanol need not be manifested to the Willow Island facility, nor does American Cyanamid need a storage permit to store the reclaimed methanol. I hope this letter answers your questions. Please feel free to give me a call if I can be of any further assistance; my telephone number is (202) 475-8551.

Sincerely yours,

Matthew A. Straus
Chief
Waste Identification Branch

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