

November 17, 1986

John B. Slemmer
Environmental Manager
SolidTek Systems Inc.
5371 Cook Road
P.O. Box 888
Morrow, Georgia 30260

Dear Mr. Slemmer:

This is in response to your letter of October 15, 1986. Under the existing regulations, a generator of hazardous waste must list all individual hazardous waste numbers that apply to wastes generated at that site, including the contents of lab-packs, when completing a notification form (Form 8700-12) or a biennial report (Forms 8700-13A and 8700-13B). With respect to the manifest, EPA regulations do not require a generator to list any waste ID numbers. A space is provided for this information only as a convenience to States who may wish to require waste ID numbers. Federal regulations require only that the appropriate DOT description and identification numbers be listed on the manifest.

No provision is made in the rules for consolidating EPA waste ID numbers where the waste streams remain discrete from each other. Therefore, with respect to the individual contents of a lab pack, we recommend that you check with your region or State to find out which approach they advise generators to follow.

Thank you for your inquiry.

Sincerely,

Matt Straus
Chief
Waste Characterization Branch

Faxback 11196

October 15, 1986

Matthew A. Straus
Chief of Waste Identification Branch
(WH562B)
Office of Solid Waste and Emergency Response
Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Straus:

I appreciate your reply to my letter, dated July 23, 1986, regarding clarification of some of the subtle points of waste identification. I'm glad that you discovered the typographical error (F005 not F002) regarding my second question, the Toluene example; (incidentally, the pH should have been 12.5 not 1.5, sodium hydroxide is a strong base; not acid).

One more area that I have discovered to be causing confusion among generators and state and federal officials concerns "lab-packed" wastes. A working definition of a "lab-pack" is: A drum containing individual inside packages of hazardous waste compounds, generally out-dated, surplus, or spent laboratory chemicals. The inside packages are surrounded by an absorbent, generally "Speedy'Dri" or vermiculite, present in sufficient quantity to absorb the total of all liquids present.

The question is; for the purposes of labeling, manifesting, shipment, treatment, storage, and/or disposal; what is the proper method to determine the EPA waste number? From both the RCRA hotline and state officials, I hear different methods.

Most commonly, though, I am told the following:

- I. Evaluate the contents of each drum as a whole; as if the drum were one uniform mixture of all of the contents. Since, by DOT regulations, only compounds of the same hazard class, (flammable liquid, oxidizer, acid, etc.) may be present in any one drum; the characteristics should be similar.
 - a). Compare the contents (as a whole) against the definitions set forth in 40 CFR Part 261 Subpart D. Choose the one waste code that applies, if one is applicable.
 - b). If none of the Subpart D codes is applicable, choose the one (or more) Subpart C codes that apply; if any are applicable.

If there is another method, that the EPA feels is preferable; or if there exists some regulation or guidance that clarifies this matter, I would greatly appreciate knowing what it is or where it may be obtained.

Could you please respond to this question? I appreciate your time and attention to this matter. Please call me if you have any questions.

Sincerely,

John B. Slemmer
Environmental Manager