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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAR 6 1987

John Skoufis
Laboratory Manager
Anscott Chemical Industries, Inc.
26 Hanes Drive
Wayne, NJ 07470

Dear Mr. Skoufis:

In reference to your letter of December 22, 1986, and your telephone conversations on Friday, January 16, 1987 and Wednesday, February 18, 1987 with Mr. Ed Abrams of my staff, I am responding with my clarification the hazardousness of typical drycleaning industry waste streams.

As I understand your process, a typical drycleaning facility generates three aqueous wastes that are contaminated with small quantities of perchloroethylene (PCE). These wastes are generated from the following three sources:

1. Condensation from PCE recovery during the normal drying cycle of fabrics in the drycleaning machine.
2. Condensation from the distillation recovery of PCE.
3. Condensation from the steam stripping of PCE from filter cartridges.

The spent solvent listings apply only to wastes that are generated when the solvents are used for their solvent properties (i.e., to solubilize or mobilize another constituent) and can no longer be used or reused without reclamation; the spent solvent listing does not apply to the process wastes that may become contaminated with the solvents during processing or manufacturing. Thus, waste No. 1 above is not a listed waste under RCRA and would not be subject to Subtitle C regulations, unless the wastewater exhibited any of the hazardous waste characteristics defined under 40 CFR 261.21-261.24 (ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity). [Please note that on June 13, 1986, the Agency proposed, among other things, to set a concentration of 0.1 mg/L as the regulatory level for PCE. Should this rule be finalized as proposed, waste No. 1 would exhibit the hazardous characteristic of organic toxicity if the level of PCE exceeded 0.1 mg/L as measured by the toxicity characteristic leaching procedure. (See 51 FR 21648.)]

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However, waste Nos. 2 and 3 above are hazardous wastes pursuant to 40 CFR 261.3(c)(2)(i) because they are residues derived from the treatment of F002 hazardous wastes (solvent recovery residues and residues from the steam stripping of filter cartridges, both containing PCE). Therefore, these wastes must be managed in accordance with the RCRA hazardous waste regulations.

If you require additional information, please feel free to call Mr. Ed Abrams at (202) 382-4787.

Sincerely,

Original Document signed

Matthew A. Straus
Waste Characterization Branch

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