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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JULY 88

3. Elementary Neutralization Units

A generator produces large volumes of corrosive waste. It is pumped directly to a tank which is an elementary neutralization unit. However, this waste (corrosive only) remains in the tank for two months before it is actually neutralized. Is this waste counted for purposes of determining generator status? Is the corrosive waste that is stored in the neutralization unit prior to treatment included in the scope of the exemptions in Sections 264.1(g)(6), 265.1(c)(10) and 270.1(c)(2)(v)?

No, this type of waste is not counted for determining generator status. As stated in the March 24, 1986 Federal Register (51 FR 10146) wastes treated in elementary neutralization units are included in the general category of exempted or excluded wastes that would not be counted in determining generator status.

Also, this waste is not counted because it is not subject to substantive regulations in 40 CFR Parts 262 and 263 as long as it remains in the neutralization unit (51 FR 10152).

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