

9444.1991(03)

## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MAY 1991

### 1. Comparative Definitions of F001 and F002

Tetrachloroethylene, trichloroethylene, methylene chloride, and 1,1,1-trichloroethylene are listed in the definitions of both F001 and F002 in 40 CFR 261.31. The listing for F001 reads "the following spent alogenated solvents used in degreasing...", while the F002 listing begins with "the following spent halogenated solvents...". Although F001 applies specifically to solvents used in degreasing according to the December 31, 1985 Federal Register the F001-FOO5 listings cover only those solvents used for their solvent properties. A solvent used in degreasing is considered to be used for its solvent properties. (50 FR 53316) Thus, a solvent, which is listed in both F001 and F002 (e.g., methylene chloride) and is used in degreasing, could be both F001 and F002. Would such a spent solvent be appropriately classified as F001, F002, or both?

It was not the intent of the Agency to apply both listings to a solvent constituent which is listed in both F001 and F002. The waste code that the spent solvent receives depends on the type of degreasing involved. Page 6 of the "listing of Hazardous Waste (40 CFR 261.31 and 261.32); Identification and Listing of Hazardous Waste Under RCRA, Subtitle C, Section 3001" (also known as the Background listings Document) clarifies the intent of the F001 listing as opposed to other spent solvents. Specifically, the F001 listing is appropriate when tetrachloroethylene, trichloroethylene, methylene chloride, and 1,1,1-trichloroethane are used in large-scale industrial degreasing operations [e.g., cold cleaning, vapor degreasing (open top and conveyORIZED), and fabric scouring]. Alternatively, tetrachloroethylene, trichloroethylene, methylene chloride, and 1,1,1, trichloroethane used in equipment cleaning or i , n smaller scale degreasing operations involving repair work (that do not employ industrial degreasing processes as described above), such as industrial, maintenance and repair, commercial service and repair, and consumer-performed maintenance and repair, receive the F002 listing.

Source: Ron Josephson, OSW (202) 475-6715  
Research: Peter LeTourneau