

RCRA/Superfund/OUST Hotline Monthly Report Question

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1. Perchloroethylene Used in Dry Cleaning

A dry cleaner uses a 50 percent perchloroethylene (tetrachloroethylene) mixture in his cleaning process. Since tetrachloroethylene appears in the listing descriptions for both F001 and F002, would the spent solvent mixture be classified as F001 or F002?

Spent tetrachloroethylene used in dry cleaning is classified as F002 (40 CFR \_261.31). The background listing document for F002 identifies certain industries that generate spent halogenated solvent meeting the F002 listing (Identification and Listing of Hazardous Waste, \_\_261,31 and 261.32 -- Listing of Hazardous Waste, page 41). According to this document, tetrachloroethylene used in laundry and dry cleaning operations is regulated as F002. Of course, the spent solvent formulation must meet the 10 percent (by volume) before use criterion in the F002 listing. Furthermore, the F001 listing is by its terms, limited to spent solvents "used in degreasing."

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