

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460**

OFFICE Of  
SOLID WASTE AND EMERGENCY  
RESPONSE

Mr. Matthew P. Caputo  
HQ USAREUR  
CMR 420, Box 2163  
APO AE 09063

Dear Mr. Caputo:

Thank you for your letter of December 27, 1996 regarding the regulatory status of ethylene glycol and unused antifreeze, as well as proper disposal methods for each.

In your letter you request information on whether pure ethylene glycol and unused antifreeze are considered either a hazardous waste or a toxic substance. The Resource Conservation and Recovery Act (RCRA), administered by the Environmental Protection Agency (EPA) regulates wastes that are deemed hazardous. Under RCRA, neither pure ethylene glycol, nor unused antifreeze containing ethylene glycol, would be considered a hazardous waste until a decision was made to dispose of those products. Once it is determined that these unused products would be disposed, they would be classified as commercial chemical products under the RCRA regulations. Since neither of these products are listed as a hazardous waste, they would only be required to be managed as a hazardous waste if they exhibited one or more of the following hazardous waste characteristics: ignitability, corrosivity, reactivity, or toxicity as determined by the Toxicity Characteristic Leaching Procedure (TCLP). If the waste demonstrates one of these characteristics, it must be handled as a hazardous waste.

Ethylene glycol is included on the list of chemicals subject to the reporting requirements of Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). Therefore, annual releases and other waste management information for ethylene glycol is reported to the Toxics Release Inventory (TRI). The TRI is designed to provide citizens, businesses, and government with release and other waste management information on the listed toxic chemicals that are being manufactured, processes, or otherwise used at covered facilities. A facility must report to the TRI if: (1) it is in a covered Standard Industrial Classification (SIC) code (or it is a Federal facility); (2) it has 10 or more full-time equivalent employees; and (3) it manufactures (includes importing) or processes more than 25,000 pounds or otherwise uses more than 10,000 pounds of any listed toxic chemical during the calendar year.

Finally, you asked for information regarding disposal procedures for unused antifreeze

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that has exceeded its shelf life. First, you may want to check with the manufacturer to determine whether the antifreeze can still be used, or if the three year time period is an absolute limit on the antifreeze's efficacy. If the antifreeze truly is expired after three years, you may want to consider recycling the unused product.

Thank you for your letter. We appreciate your concern regarding the proper disposal of ethylene glycol and unused antifreeze. If you have additional questions, please contact Gail Cooper of my staff at (703) 308-8799.

Sincerely yours,

David Bussard, Director  
Hazardous Waste Identification  
Division

cc: Elizabeth Cotsworth, OSW  
Maria Doa, OPPTS