

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT
September 2001

1. Land Disposal Restrictions for F001-F005 Solvent Wastes

The RCRA Subtitle C land disposal restrictions (LDR) require that facilities treat their F001-F005 spent solvent wastes to meet concentration-based treatment standards for 30 constituents of concern, including carbon disulfide, cyclohexanone, and methanol (40 CFR Section 268.40). These treatment standards specify concentrations in wastewater for all 30 solvent constituents, but provide concentrations in nonwastewater for only 27 of these constituents. There are no specified concentrations for carbon disulfide, cyclohexanone, and methanol in nonwastewaters. However, the LDR treatment standards also include a subcategory for F003 and/or F005 spent solvent wastes that contain any one or combination of carbon disulfide, cyclohexanone, and methanol as the only listed solvent. These standards include treatment levels for both the wastewater and nonwastewater forms of these constituents. If a facility generates F001-F005 solvent wastes containing carbon disulfide, cyclohexanone, and methanol, along with other constituents of concern, must it only treat these three constituents when they are in wastewaters?

Facilities generating F001-F005 spent solvent wastes containing carbon disulfide, cyclohexanone, and methanol, along with other listed solvent constituents, need to treat only the wastewater forms of these three constituents. In addition, of course, the facility must treat the wastewater and nonwastewater forms of the other 27 solvent constituents (Section 268.40(f)). The nonwastewater forms of these three constituents do not require treatment when they appear with other F001-F005 constituents, due to the difficulties associated with the analyses of these constituents in nonwastewater matrices. EPA believes that treatment of the other 27 halogenated, aromatic, and oxygenated solvents covered by the F001-F005 nonwastewater standards will also treat for the carbon disulfide, cyclohexanone, and methanol (Final BDAT Background Document for F001-F005 Spent Solvents; June 1992; page 4-1).

A facility must treat F003 and/or F005 spent solvent wastes that contain only one or a combination of carbon disulfide, cyclohexanone, and methanol to the concentration levels specified for this subcategory. Finally, if the F001-F005 solvent wastes also exhibit a hazardous waste characteristic requiring treatment for all underlying hazardous constituents, the facility must treat the carbon disulfide, cyclohexanone, and/or methanol to meet both the wastewater and nonwastewater standards specified in Section 268.48.

