

"Off-Specification Paraformaldehyde Meets Commercial Chemical Product Listing"

Key Words: Commercial chemical product; U122

QUESTION: A manufacturer stores product formaldehyde (CAS No. 50-00-0) in containers before use in a manufacturing process. While in storage, some of the pure formaldehyde polymerizes to form paraformaldehyde (CAS No. 30525-89-4), which is unusable in the manufacturing process because it does not meet required specifications. The manufacturer separates the paraformaldehyde from the usable formaldehyde and sends the off-specification chemical for disposal. Unused commercial chemical products containing formaldehyde are listed as U122 when discarded (40 CFR §261.33(f)). Paraformaldehyde is not found on the P- or U-list (40 CFR §§261.33 (e) or (f)). When discarded, is the off-specification paraformaldehyde a listed hazardous waste?

ANSWER: In the above scenario, paraformaldehyde is an off-specification form of formaldehyde and meets the U122 listing (40 CFR §261.33(b)). When a commercial chemical product listed in §§261.33(e) or (f) undergoes a chemical change that renders the chemical off-specification, the applicable P- or U-listing for the original chemical applies, even in cases where the chemical composition has changed sufficiently to require assignment of a different CAS Number. (March 1994 Monthly Hotline Report)