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MEMORANDUM

SUBJECT: Classification of Wastes Containing  
F001-F005 Constituents

FROM: Jeffery D. Denit  
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Office of Solid Waste (WH-562)

TO: Phillip L. Bobel  
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This is in response to your memo of December 30, 1987, on waste classification, as per Mr. Sandoval's request. I think the confusion Mr. Sandoval is experiencing is due to imprecise use of terms. A person should not classify a waste that contains an F001-F005 hazardous constituent as an "F" waste for land ban purposed, or on the manifest. However, if a person generates one or more of the specifically listed "F" spent solvents e.g., spent trichloroethylene (F001) and then mixes the spent solvent with another waste, the mixture does in fact contain F001 and therefore is subject to the land disposal restrictions.

When an F001 waste is mixed with another hazardous waste, the proper description of the mixture would include all applicable waste codes. For example, F001 mixed with an ignitable waste (D001) should be described as F001, D001, and the mixture would be subject to the treatment standard in 40 CFR Section 268.41. There is no de minimus amount below which a listed waste need not be identified. (Of course, if the F001/D001 mixture does not exhibit ignitability, the classification for the mixture would not have to include the "D001" descriptor. Further, you should note that when a waste listed only because it exhibits a characteristic, e.g., F003, is mixed with a solid waste and the resultant mixture does not exhibit a characteristic, the mixture is not hazardous waste. See 40 CFR Section 261.3(a)(iii).)