

**From:** Betty Burns  
**To:** Weglewski, Linda  
**Date:** 3/5/03 2:25PM  
**Subject:** Re: recycling dates

Section 262.11(d) Generator has determined that operation(s) will or have generated a hazardous waste spent solvent that is no longer useable on-site as is. Generator is collecting the hazardous waste spent solvent in drums.

Section 261.5(c) Generator status must be determined regardless of the generator's intent for reclamation or other. If over 2200 pounds/month of hazardous waste is generated, this site is classified as a large quantity generator, and the accumulation of the hazardous waste spent solvent is subject to applicable requirements of Section 262.34. This Section allows the LQG generator to accumulate this hazardous waste spent solvent for 90 days. During the 90-day accumulation period, the generator may choose to remove the waste from storage or accumulation for treatment in a distillation unit (exempt treatment unit), or other. The distillation process should generate a new product solvent for use, and distillation bottom waste.

Based upon Section 261.5(d)(2), the distillation bottom hazardous waste produced by reclamation should not be counted because it was produced from hazardous waste that was already counted. This Section means that the distillation process has generated a hazardous waste that is exempt from being counted. This Section did not say the distillation bottoms would be exempt from the accumulation requirements of Section 262.34 therefore, it would be subject to new beginning accumulation start date (90-day accumulation limit), labelling, etc. Tis my interpretations.

>>> Linda Weglewski 03/05/03 10:56AM >>>

Betty - I agree with you; that's how we did it at MacDermid. But I can't find a citation to back it up. Do you know of one?

Thanks.

>>> Betty Burns 03/05/03 10:28AM >>>

My original answer of "yes" is for the first part of Jack's statement. However, I believe that the generated still bottoms should get a new 90-day, etc., beginning accumulation start date. Also, I think that the count for determination of generator status should be done when the waste is first generated/accumulated (that is, if the waste is collected in drum or tank) before distillation. If the waste is discharged directly from the process by pipe to the distillation unit, then count only the distillation bottoms for determination of generator status.

>>> Jack Dempsey 03/05/03 09:13AM >>>

look at 261.5(d)(2) - it's not easy for some to do, so I'd like for some of yall tell us how you recommend they do it?

>>> Chituru Wokpara 03/05/03 07:49AM >>>

Yes, how about their status? Should their generation status be determined before solvent recycling or after?

>>> Jack Dempsey 03/04/03 10:25AM >>>

do we all agree that for our generators that have a company come on-site, recycle their spent solvent, and leave them distilled solvent and still bottoms, do we agree the drums of spent solvent have to managed as haz waste from the start (prior to recycling) and the still bottoms afterwards and they keep the same start date as the original waste (not a new 90 days)?