UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

February 17, 1993

Mr. Kevin Kelly
W.R.Grace & Company
55 Hayden Avenue
Lexington, MA 02173

Dear Mr. Kelly:

This letter is in response to your December 11,1992 letter requesting clarification of the classification of W.R. Grace's rubber/toluene slurry waste and the possibility of handling piping, contaminated with this waste, as a scrap metal.

The first of your assumptions, that the spent rubber/toluene slurry should be classified as a F005 waste, is accurate. The presence of spent toluene, which is used for its solvent properties in dissolving the rubber, would place the waste under the listing of F005.

In your second assumption, any residual of the F005 waste that remains on the piping at the time of decommission of that equipment would cause the equipment to be categorized as a F005, due to the presence of a listed waste on the metal piping, is also correct. The piping contaminated with F005 is considered hazardous debris. As defined in the August 18, 1992 Federal Register, a ""clean debris surface" means the surface , when viewed without magnification, shall be free of all visible contaminated soil and hazardous waste except that the residual staining and waste consisting of light shadows, slight streaks, or minor discoloration, and soil waste in cracks, crevices and pits may be present such that such staining and waste and soil in cracks, crevices, and pits shall be limited to no more than 5% of each square inch of surface."

Once the listed waste is removed from the pipe through some cleaning process, the rinsate would be characterized as F005 under the mixture rule. The mixture rule states that when a solid waste is mixed with a listed waste the entire mixture is considered a listed waste. This newly generated F005 rinsate should then be managed appropriately.

If you have any more questions on this issue, please feel free to call me at 573-5745.

Sincerely,

Lisa Papetti

Lisa Papetti, Environmental Engineer
MA & RI Waste Regulation Section

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