



Ken Rota

01/14/03 08:06 AM

To: dfarmer@wurtheastern.com
cc: Cynthia Greene/R1/USEPA/US@EPA, Gary
Gosbee/R1/USEPA/US@EPA, Jeff Fowley/R1/USEPA/US@EPA,
Sharon Leitch/R1/USEPA/US@EPA
Subject: Re: Oclansorb

Dear Mr. Farmer,

Your email was forwarded to me by Cynthia Greene. The majority of the New England states regulate used oil, including spills involving used oil. The fact that peat is used instead of clay does not matter since it is the presence of oil which causes the material to be regulated. As such, I would direct you to contact each state regarding their procedures for handling oil contaminated materials. Depending upon the individual state involved, oil collected by your absorbent could be regulated as a state hazardous waste and subject to a variety of requirements. While the possibility may exist for this type of waste to be burned in an incinerator, such a determination is site specific and is based upon the characteristics exhibited in the oil by a particular generator and is not dependent upon the use of your particular product or the fact that it is peat-based. My advice to you, therefore, is to have your customers contact the various state agencies in which they are located to provide them with the site-specific details of the oils that they use and the types of contaminants that may be contained in these oils to determine the appropriate handling, management and disposal methods.

Sincerely,

Ken Rota, Chief
RCRA Enforcement Unit
EPA - New England Office

Cynthia Greene



Cynthia Greene

01/13/03 08:58 AM

To: Ken Rota/R1/USEPA/US@EPA
cc:
Subject: Oclansorb

Can you answer?

Cynthia L. Greene
Senior Advisor
Office of Assistance and Pollution Prevention
US EPA New England
One Congress Street, Suite 1100 (SPP)
Boston, MA 02114-2023
617-918-1813
FAX: 617-918-0813
greene.cynthia@epa.gov

----- Forwarded by Cynthia Greene/R1/USEPA/US on 01/13/03 08:57 AM -----



**Doug_Farmer@natacc
t.com**

01/10/03 10:39 AM

To: Cynthia Greene/R1/USEPA/US@EPA
cc:
Subject: Oclansorb

Hello Cynthia,

I left a voice mail for you earlier today & wanted to follow up with an e-mail.

I work for a distribution company that sells Oclansorb which is a organic peat moss from Newfoundland. It is used primarily to pick up waste oil. I would like to know the guidelines that I can use throughout MA (& New England if the same) regarding disposal.

I have a 1992 paper from the DEP on "Waste management guidance for industrial wipers and sorptive materials contaminated with waste oil" which shows a hierarchy of the disposal of waste oil:

1.Reduce 2. Reuse/Recycle 3.Incinerate 4.Landfill

Our product would fit into #3 waste oil that was spilled in smaller quantities that could not be picked up and recycled.

The paper mentions a "one drop test" & paint filters liquids test.

Oclansorb has passed:

- TCLP Procedure 1311
- LT50 Toxicity Test
- Paint Filter Test 9095
- ASTM Test

We are selling Oclansorb as a product that is more environmentally friendly than clay based products because:

- It uses much less material
- It will not leach oil

I are not looking for an endorsment but would like to be clear what I can tell my customers:

-Is Oclansorb ok to send to incinerator (preferred) or landfill if used within the hierarchy of waste management?

I would be glad to provide information and product if needed.

Please advise. Thank you.

Wurth Eastern Fastener Corp

Doug Farmer

240 Cherry Street

Shrewsbury, MA 01545

cell 508-612-6102 (best place to reach me)

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dfarmer@wurtheastern.com