

**Gary Gosbee**

04/23/03 09:20 AM

To: Sharon Leitch/R1/USEPA/US@EPA  
cc:  
Subject: Waste Machine Coolant Question

Sharon - please see me on this when you have a minute.

Thx  
Gary

----- Forwarded by Gary Gosbee/R1/USEPA/US on 04/23/03 09:19 AM -----

**Ken Rota**

04/18/03 07:23 AM

To: carolmarsh@snet.net  
cc: Sharon Leitch/R1/USEPA/US@EPA, Gary  
Gosbee/R1/USEPA/US@EPA, Carol  
Krasauskis/R1/USEPA/US@EPA  
Subject: Waste Machine Coolant Question

Dear Ms. Marsh,

I was forwarded your message regarding labelling requirement for waste machine coolants and questions about what type of machine coolants can be mixed. As a practical matter, we have found that many waste machine coolants often become contaminated from the use of degreasing solvents located near this equipment and used to clean parts. Not knowing you're exact situation, I would advise you to first determine whether or not your waste coolants are actually hazardous wastes if you operate your facility in a similar manner. As far as waste coolants are concerned, federal requirements found at Part 279 identify basic waste management standards that identify the requirements you need to comply with. You should be able to download these regulations off the internet from the EPA general website.

In general, oils regulated under Part 279 would be marked as used oil and you would have some other basic container management standards to comply with as well. There is no federal prohibition against mixing different types of coolants (water-based/oil-based). However, you may find that the disposal facility may not prefer crossed mixed coolants if it impacts their ability to recycle this material. As a final suggestion, you should contact the CT DEP office. Many of our New England states regulate waste coolants as hazardous wastes regardless of whether these coolants have become contaminated from other on-site activities or not. The CT DEP can provide you with the specific information you need to comply with their rules and regulations.

Sincerely,

Ken Rota, Chief  
RCRA Compliance Unit  
US EPA - New England Region  
Direct Tel: (617) 918-1751  
Direct Fax: (617) 918-0751  
Office Fax: (617) 918-1809  
<http://www.epa.gov/region1>

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I need help locating the labeling requirements of stored waste machine coolants and how to find out what types of coolants can be mixed.  
email address  
carolmarsh@snet.net  
first and last name

carol marsh  
organization  
SSI Manufacturing  
phone number  
860-589-8004 x112

**Gary Gosbee**

04/23/03 10:05 AM

To: Sharon Leitch/R1/USEPA/US@EPA  
cc:  
Subject: Waste Determination Question

Sharon, let's discuss when you have a minute.

Thx  
Gary

----- Forwarded by Gary Gosbee/R1/USEPA/US on 04/23/03 10:04 AM -----

**Ken Rota**

04/15/03 08:53 AM

To: ashetland@lithion.com  
cc: Carol Krasauskis/R1/USEPA/US@EPA, Sharon  
Leitch/R1/USEPA/US@EPA, Gary Gosbee/R1/USEPA/US@EPA  
Subject: Waste Determination Question

Dear Mr. Shetland,

I was forwarded your message concerning waste determinations for wastes not listed under Part 273. I'm not exactly sure what the misunderstanding might be but for clarification purposes, Part 273 is designed to allow reduced management standards for wastes that would otherwise be regulated as hazardous wastes and subject to the full-blown requirements of 40 CFR Part 262. If particular waste streams are not listed under Part 273 then they do not qualify for this special exemption unless and until the CT DEP adds these additional waste streams to the Part 273 list.

As such, the waste determination regulations already outlined at 40 CFR 262.11 and in effect for the last 23 years would be the process required by all generators to determine if any solid waste generated by their activities may be hazardous. So if, for example, any solid wastes your company produces are not "listed" hazardous wastes under Subpart D of Part 261 or do not qualify for any of the special exemptions that may apply (such as Part 273), you are still required to determine whether these wastes would otherwise fail any of the hazardous characteristics described Part 261, Subpart C. These procedures outlined in the regulations identified specific test methods and also allow generator knowledge, provided that you, as the generator, are able to obtain information that documents the types of constituents that are found in your products and demonstrate the concentrations of any hazardous constituents would not exceed the regulatory limits set for those chemicals.

The characteristics described at Part 261, Subpart C represent the federal "safety net" designed to capture wastes that exhibit certain characteristics that may pose a threat to human health or the environment that aren't otherwise specifically listed. EPA always directs every generator to contact their state agency since many state agencies may be more strict and often regulate additional wastes as state hazardous wastes that the federal government did not include in our list of hazardous chemicals.

Hopefully this information helps you to properly characterize your wastes.

Sincerely,

Ken Rota, Chief  
RCRA Compliance Unit  
US EPA - New England Region  
Direct Tel: (617) 918-1751  
Direct Fax: (617) 918-0751