



DIRECTIVE NUMBER: 9441.23(85)

TITLE: Disposal Requirements of Scrap DEHP and Small
Capacitors Containing DEHP

APPROVAL DATE: 6-27-85

EFFECTIVE DATE: 6-27-85

ORIGINATING OFFICE: Office of Solid Waste

☒ **FINAL**

☐ **DRAFT**

LEVEL OF DRAFT

- ☐ A — Signed by AA or DAA
- ☐ B — Signed by Office Director
- ☐ C — Review & Comment

REFERENCE (other documents):

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Key Words: Characteristics of Hazardous Waste, Exclusion, Listing

Regulations:

Subject: Disposal Requirements of Scrap DEHP and Small Capacitors
Containing DEHP

Addressee: N. Ray Clark, Universal Manufacturing Corp., 200 Robin Road,
Paramus, New Jersey 07652

Originator: Matthew A. Straus, Chief, Waste Identification Branch

Source Doc: #9444.23(85)

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Summary:

Contaminated or unusable DEHP that becomes a waste generated in the normal course of the manufacturing process must be disposed of according to the RCRA hazardous waste rules.

Capacitors unusable for electrical or mechanical reasons are not defined as a listed hazardous waste and would only be hazardous if they exhibit one or more of the characteristics of a hazardous waste.

Miscellaneous solid materials that absorbed some DEHP would be listed as hazardous if they became contaminated as a result of waste management activities but would not be listed as hazardous if they became contaminated as a result of use during the manufacturing process.

JUN 27 1985

Mr. N. Ray Clark
Universal Manufacturing Corp.
200 Robin Road
Paramus, New Jersey 07652

Dear Mr. Clark:

This letter is in response to your letter dated April 30, 1985, regarding the disposal requirements of scrap (off-specification) DEHP and small capacitors which contain DEHP. First, let me apologize for taking so long in getting back to you; I have been very busy and hope my delay has not created a problem for you. Concerning your specific questions, I generally agree with the answers given by Mr. Travis Wagner of the RCRA Hotline. More specifically:

- Contaminated or unusable DEHP which is generated in the normal course of the manufacturing process and becomes a waste which must be disposed of is subject to the RCRA hazardous waste rules (i.e., if shipped-off-site must be manifested, must go to a facility with interim status or one which is fully permitted, etc.)
- Capacitors which are found to be unusable for electrical or mechanical reasons are presently not defined as a listed hazardous waste (i.e., U028). Therefore, these wastes would only be hazardous if they exhibit one or more of the hazardous waste characteristics (i.e., ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity).

With regard to your third question, you ask whether rags, gloves, chipboard, and other miscellaneous solid materials which have absorbed some DEHP are RCRA hazardous wastes. The answer to this question is yes and no; that is, if the solid material has become contaminated as a result of waste management activities (i.e., clean-up of spills or leaks or from mixing waste DEHP with other wastes), these contaminated materials would be defined as RCRA listed hazardous wastes. On the other hand, if the contamination is a result of its use during the manufacturing process (i.e., gloves becomes contaminated as a result of handling during the manufacturing process), these solid materials would not be defined as listed hazardous

wastes; these materials, however, would be a hazardous wastes if they exhibit any of the characteristics of hazardous wastes.

Please feel free to give me a call if I can be of any further assistance; my telephone number is (202) 475-8551.

Sincerely yours,

Matthew A. Straus, Chief
Waste Identification Branch

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