



**DIRECTIVE NUMBER:** 9443.08(84)

**TITLE:** Designation for Waste Ink and Solvent Mixtures  
Generated from Printing Facilities

**APPROVAL DATE:** 11-23-84

**EFFECTIVE DATE:** 11-23-84

**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: Solvents

Regulations: 40 CFR 261.31

Subject: Designation for Waste Ink and Solvent Mixtures Generated from Printing Facilities

Addressee: Donald Dean, Environmental Manager, Imperial Manufacturing Company, Underwood Avenue, P.O. Box 280, Plattsburgh, N.Y. 12901

Originator: Eileen Claussen, Characterization and Assessment Division, Office of Solid Waste

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Summary:

Waste inks containing solvents generated from printing facilities are considered hazardous if they exhibit one or more of the characteristics of hazardous waste (i.e., ignitability, reactivity, EP toxicity, and corrosivity). Waste ink containing MEK, MIBK, toluene, xylene, and acetone will probably exhibit ignitability and should be designated as EPA Hazardous Waste No. D001.

Solvent mixtures from the cleaning of pumps, lines, and tanks at printing facilities are not currently covered by the solvent listings in 40 CFR 261.31. They are hazardous if they exhibit one or more of the characteristics of hazardous waste. In authorized States, however, the State rules, rather than the Federal rules, apply.

NOV 23 1984

Mr. Donald Dean  
Environmental Manager  
Imperial Manufacturing Company  
Underwood Avenue  
P.O. Box 280  
Plattsburgh, N.Y. 12901

Dear Mr. Dean:

This letter responds to your inquiry of November 9, 1984, regarding the correct designation for waste ink and solvent mixtures generated from printing facilities.

First, waste inks containing solvents are not listed hazardous waste; however, these inks are considered hazardous wastes if they exhibit one or more of the characteristics of hazardous waste (i.e., ignitability, reactivity, EP toxicity and corrosivity). In your particular case, waste ink containing MEK, MIBK, toluene, xylene, and acetone will probably exhibit ignitability. Should this be the case, these wastes are deemed hazardous waste and, as such, should be designated as EPA Hazardous Waste Number D001.

Solvent mixtures from the cleaning of pumps, lines and tanks, as described in your letter, are not currently covered by the solvent listings in 40 CFR 261.31. Therefore, they are hazardous waste only if they also exhibit one or more of the characteristics of hazardous waste. Within the next few months, the Agency will propose to amend the listing to include certain solvent mixtures. Thus, many of these solvents will be brought under Subtitle C control.

If your waste management activities occur in a State that has been authorized under RCRA, then the State rules, rather than the Federal rules, apply.

We recommend that you consult with the appropriate States to determine whether they interpret their listing as covering solvent mixtures. Agency data indicate that New York State

interprets their listing as applying to solvent mixtures as well as single solvents. In addition, it is within the authorized State's discretion to determine the appropriate classification for wastes that are both listed and exhibit a characteristic.

Should you have questions, or require additional information, please contact Jacqueline Sales, of my staff, at (202) 382-4807.

Sincerely,

Eileen Claussen  
Characterization and Assessment Division  
Office of Solid Waste