(TENNECO) Tenneco Chemicals, Inc. INTEROFFICE COMMUNICATION
COMPANY

(JWK-125-80)

TO: Distribution DATE: November 11, 1980

FOR:

FROM: J. W. Kachtick

RE: Manifest System For Off-Site Disposal Of Hazardous Wastes

Effective November 19, 1980, all hazardous wastes (as defined by the Resource Conservation and Recovery Act (RCRA) regulations that are generated at the Pasadena facility must be accompanied by a multicopy manifest if they are transported from the plant for off-site disposal. This system is very similar to the Texas manifest system, which has been in operation for some time.

The Texas Department of Water Resources is currently in the process of printing new manifest forms, which will satisfy both the state and federal (RCRA) requirements. Until these are received, we will have to fill out two manifest forms, the old state forms and the new TCI (RCRA) forms.

Additionally, all drums which are filled with hazardous waste (for either off-site or on-site disposal) must have a Hazardous Waste label attached at the time the drum is started being filled. If the drum is emptied and re-used, a new label must be attached each time a new filling starts. The reason for this is to verify that the drums are emptied or moved out within 90 days. Otherwise, they are considered to be "storage" of hazardous wastes.

The only hazardous wastes that are routinely generated in the plant and transported off-site at this time are:

1. VCM heavy ends
2. Spent THF

However, other materials are generated periodically which may be considered to be hazardous. Please contact me at Extension 427 when this occurs so a determination if the waste is "hazardous" or not can be made prior to off-site or on-site disposal.

Only those empty containers that have held any of the acutely toxic commercial products (not wastes) on the attached list that are discarded and have not been triple-rinsed are considered to be hazardous wastes.

Attached for your referral is the plant procedure for the disposal of waste oil or chemicals from the Safety Manual.

If you have any questions on these requirements, do not hesitate to contact me.

J. W. Kachtick

JWK/cjm
Attachments

TEN 2671

cc: JEL, OJM, HEF, SER, MLH, CAH, WHH, TTM, RJY, NLT, CCC, LC, MAW, JWE, JFR, RTC, NB

Substance [1]
)
,
0
nitrophenol
101
)1
ryacetic acid (2,4 D)
ne
)31
)7
hylthio)ethyl)ester of phos-
azinyl)phosphorothioic
one acid, 0-p-nitrophenyl ester
-(methylamino)-methyl benzyl
osphate
14
aphthalene, 1,2,3,4,10,10-
a,5,8,8a-hexahydro endo,
hylthio)-2-butanone-O-
rbonyl] oxime
nphenethylamine
nol see P034
and salts
)
0
REAL see P108
) P020
ED KILLER see P020
EED KILLER see P020
0x0
92
DUOCIDE see P001
2
OWDER see P001
ium salt
71
71
e P071
see P065
092
I
ro-1,4,4a,5,8,8a-
ndo, endo-dimethanonaph-
-cyclo-5-norbornene) 2,3-
ne P050
ate
92
2
P0x-8
5
P050
ester
50

Hazardous waste No	Substance [1]
	MALIK see P050
	MARLVAN see P001
	MARFUN see P001
	MARTIN'D MARFUN see P001
	MAVLHAN see P001
	MEGATOX see P005
P065	Mercury fulminate
	MERSOLITE see P092
	METACID 50 see P071
	METAFOS see P071
	METAPHOR see P071
	METAPHOS see P071
	METASOL 30 see P092
P066	Methomyl
P067	2-Methylaziridine
	METHYL-E 605 see P071
P068	Methyl hydrazine
	Methyl isocyanate see P064
P069	2-Methyllactonitrile
P070	2-Methyl 2-(methylthio)propionaldehyde-o-(methylcarbonyl) oxime
	METHYL NIRON see P042
P071	Methyl parathion
	METRON see P071
	MOLE DEATH see P108
	MOUSE-NOTS see P108
	MOUSE-RID see P108
	MOUSE-TOX see P108
	MUSCIMOL see P007
P072	1-Naphthyl 2-thiourea
P073	Nickel carbonyl
P074	Nickel cyanide
P075	Nicotine and salts
P076	Nitric oxide
P077	p-Nitroaniline
P078	Nitrogen dioxide
P079	Nitrogen peroxide
P080	Nitrogen tetroxide
P081	Nitroglycerine (R)
P082	N-Nitrosodimethylamine
P083	N-Nitrosodiphenylamine
P084	N-Nitrosomethylvinylamine
	NYLMERATE see P042
	OCTALOX see P037
P085	Octamethylpyrophosphoramide
	OCTAN see P042
P086	Oleyl alcohol condensed with 2 moles ethylene oxide
	OMPA see P085
	OMPACIDE see P085
	OMPAX see P085
P087	Osmium tetroxide
P088	7-Oxabicyclo[2.2.1]heptane-2,3-dicarboxylic acid
	PANTARIN see P001
	PANORAM D-31 see P037
	PANTHERINE see P007
	PANWARFIN see P001
P089	Parathion
	PCP see P090
	PEN-CAP-M see P071
	PENOXYL CARBON N see P048
P090	Pentachlorophenol
	Pentachlorophenate see P090
	PENTA KILL see P090
	PENTASOL see P090
	PENWAR see P090
	PERMICIDE see P090
	PERMAGUARD see P090
	PERMATOX see P090
	PERSITE see P090
	PENTOX see P090
	PESTOX III see P085
	PHENMAD see P092
	PHENOTAN see P020
P091	Phenyl dichloroarsine
	Phenyl mercaptan see P014
P092	Phenylmercury acetate
P093	N-Phenylthiourea
	PHILIPS 1861 see P008
	PHIX see P092
P094	Phorate
P095	Phosgene
P096	Phosphine
P097	Phosphorothioic acid, 0,0-dimethyl ester, 0-ester with N,N-dimethyl benzene sulfonamide
	Phosphorothioic acid 0,0-dimethyl-0-(p-nitrophenyl) ester see P071
	PIED PIPER MOUSE SEED see P108
P098	Potassium cyanide
P099	Potassium silver cyanide
	PREMERGE see P020
P100	1,2-Propanediol
	Propargyl alcohol see P102
P101	Propanenitrile

Hazardous waste No	Substance [1]
P102	2-Propyn-1-ol
	PROTHIOMADIN See P001
	QUICKSAM see P092
	QUINTOX see P037
	RAT AND MICE BAIT see P001
	RAT-A-WAY see P001
	RAT-B-GON see P001
	RAT-O-CIDE #2 see P001
	RAT-GUARD see P001
	RAT-KILL see P001
	RAT-MIX see P001
	RATS-NO-MORE see P001
	RAT-OLA see P001
	RATOREX see P001
	RATTUNAL see P001
	RAT-TROL see P001
	RO-DETH see P001
	RO-DEX see P108
	ROSEX see P001
	ROUGH & READY MOUSE MIX see P001
	SANASEED see P108
	SANTOBRITE see P090
	SANTOPHEN see P090
	SANTOPHEN 20 see P090
	SCHRADAN see P085
P103	Selenourea
P104	Silver Cyanide
	SMITE see P105
	SPARIC see P020
	SPOR-KIL see P092
	SPRAY-TROL BRAND RODEN-TROL see P001
	SPURGE see P020
P105	Sodium azide
	Sodium coumadin see P001
P106	Sodium cyanide
	Sodium fluoroacetate see P056
	SODIUM WARFARIN see P001
	SOLFARIN see P001
	SOLFOBLACK BB see P048
	SOLFOBLACK SB see P048
P107	Strontium sulfide
P108	Strychnine and salts
	SUBTEX see P020
	SYSTAM see P085
	TAG FUNGICIDE see P092
	TEKWAISA see P071
	TEMIC see P070
	TEMIK see P070
	TERM-I-TROL see P090
P109	Tetraethyldithiopyrophosphate
P110	Tetraethyl lead
P111	Tetraethylpyrophosphate
P112	Tetranitromethane
	Tetraphosphonic acid, hexaethyl ester see P062
	TETROSULFUR BLACK PB see P048
	TETROSULFHUR PBR see P048
P113	Thallic oxide
	Thallium peroxide see P113
P114	Thallium selenite
P115	Thallium (I) sulfate
	THIFOR see P092
	THIMUL see P092
	THIODAN see P050
	THIOFOR see P050
	THIOMUL see P050
	THIONEX see P050
	THIOPHENIT see P071
P116	Thiosemicarbazide
	Thiosulfan ionol see P050
P117	Thiuram
	THOMPSON'S WOOD FIX see P090
	TIOVEL see P050
P118	Trichloromethanethiol
	TWIN LIGHT RAT AWAY see P001
	USAF RH-8 see P059
	USAF EK-4950 see P002
P119	Vanadic acid, ammonium salt
P120	Vanadium pentoxide
	VOFATOX see P071
	WANADU see P120
	WARCOUMIN see P001
	WARFARIN SODIUM see P001
	WARFICIDE see P001
	WOFOTOX see P072
	YANOCK see P057
	YASONOCK see P058
	ZIARNIK see P092
P121	Zinc cyanide
P122	Zinc phosphide (R,T)
	ZOOCOUMARIN see P001

[1] The Agency included the trade names of which it is aware, an omission of a trade name does not imply that the omitted material is not hazardous. The material is hazardous if it is listed under its generic name.

§ 261.32 Hazardous waste from specific sources. - Continued

Industry and EPA hazardous waste No	Hazardous waste	Hazard code
K054	Chrome (blue) shavings generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish, hair save/chrome tan/retan/wet finish, retan/wet finish, no beamhouse, through the blue, and shearing	(T)
K055	Buffing dust generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish, retan/wet finish, no beamhouse, and through the blue	(T)
K056	Sweer screenings generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish, hair save/chrome tan/retan/wet finish, retan/wet finish, no beamhouse, through the blue; and shearing	(T)
K057	Wastewater treatment sludges generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish, hair save/chrome tan/retan/wet finish, retan/wet finish, no beamhouse, through the-blue and shearing	(T)
K058	Wastewater treatment sludges generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish, hair save/chrome tan/retan/wet finish, and through the-blue	(R, T)
K059	Wastewater treatment sludges generated by the following subcategory of the leather tanning and finishing industry: hair save/non-chrome tan/retan/wet finish	(T)
Iron and Steel		
K060	Ammonia still lime sludge from coking operations	(T)
K061	Emission control dust/sludge from the electric furnace production of steel	(T)
K062	Spent pickle liquor from steel finishing operations	(C, T)
K063	Sludge from lime treatment of spent pickle liquor from steel finishing operations	(T)
Primary Copper K064	Acid plant blowdown slurry/sludge resulting from the thickening of blowdown slurry from primary copper production	(T)
Primary Lead K065	Surface impoundment solids contained in and dredged from surface impoundments at primary lead smelting facilities	(T)
Primary Zinc:		
K066	Sludge from treatment of process wastewater and/or acid plant blowdown from primary zinc production	(T)
K067	Electrolytic anode sumps sludges from primary zinc production	(T)
K068	Cadmium plant leach residue (iron oxide) from primary zinc production	(T)
Secondary Lead, K069	Emission control dust/sludge from secondary lead smelting	(T)

§ 261.33 Discarded Commercial Chemical Products, Off-Specification Species, Containers, and Spill Residues Thereof.

The following materials or items are hazardous wastes if and when they are discarded or intended to be discarded:

(a) Any commercial chemical product, or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this section.

(b) Any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraphs (e) or (f) of this section.

(c) Any container or inner liner removed from a container that has been used to hold any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph (e) of this section, unless:

(1) The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate;

(2) The container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or

(3) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container, has been removed.

(d) Any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this Section.

[Comment: The phrase "commercial chemical product or manufacturing chemical intermediate having the generic name listed in . . ." refers to a chemical substance which is manufactured or formulated for commercial or manufacturing use. It does not refer to a material, such as a manufacturing process waste, that contains any of the substances listed in paragraphs (e) or (f). Where a manufacturing process waste is deemed to be a hazardous waste because it contains a substance listed in paragraphs (e) or (f), such waste will be listed in either § § 261.31 or 261.32 or will be identified as a hazardous waste by the characteristics set forth in Subpart C of this Part.]

(e) The commercial chemical products or manufacturing chemical intermediates, referred to in paragraphs (a) through (d) of this section, are identified as acute hazardous wastes (H) and are subject to the small quantity exclusion defined in § 261.5(e). These wastes and their corresponding EPA Hazardous Waste Numbers are:

Hazardous waste No.	Substance [1]
	1080 see P058
	1031 see P057
	(Acetato)phenylmercury see P092
	Acetone cyanohydrin see P069
P001	3-(alpha-Acetonylbenzyl)-4-hydroxycoumarin and salts
P002	1-Acetyl-2-thiourea
P003	Acrolein
	Agrin see P007
	Agrosan GN 5 see P092
	Aldicarb see P069
	Aldrin see P048

—Continued

Hazardous waste No.	Substance [1]
P004	Aldrin
	Algimycin see P092
P005	Allyl alcohol
P006	Aluminum phosphide (R)
	ALVIT see P037
	Aminoethylene see P054
P007	5 (Aminomethyl)-3-isoxazolol
P008	4 Aminopyridine
	Ammonium metavanadate see P119
P009	Ammonium picrate (R)
	ANTIMUCIN WDR see P092
	ANTUFIAT see P073
	AQUATHOL see P088
	ARETIT see P020
P010	Arsenic acid
P011	Arsenic pentoxide
P012	Arsenic trioxide
	Atheroidin see P001
	AVITROL see P008
	Azindone see P054
	AZOTOS see P061
	Azophos see P061
	BANTU see P072
P013	Barium cyanide
	BASENITE see P020
	BCME see P016
P014	Benzenethiol
	Benzopin see P050
P015	Beryllium dust
P016	Bis(chloromethyl) ether
	BLADAN-M see P071
P017	Bromoacetone
P018	Brucine
P019	2-Butanone peroxide
	BUFEN see P092
	Butaphene see P020
P020	2-sec-Butyl-4,6-dinitrophenol
P021	Calcium cyanide
	CALDON see P020
P022	Carbon disulfide
	CERESAN see P092
	CERESAN UNIVERSAL see P092
	CHEMOX GENERAL see P020
	CHEMOX P.E. see P020
	CHEM-TOL see P090
P023	Chloroacetaldehyde
P024	p-Chloroaniline
P025	1-(p-Chlorobenzoyl)-5-methoxy-2-methylindole-3-acetic acid
P026	1-(o-Chlorophenyl)thiourea
P027	3-Chloropropionitrile
P028	alpha Chlorotoluene
P029	Copper cyanide
	CHELTOX see P108
	Coumadin see P001
	Coumafen see P001
P030	Cyanides