

PPC 9441.1984(36)

GASES VENTED FROM COMPRESSED GAS CYLINDERS - TREATING OF FLUORINE AND OTHERS

DEC 17 1984

MEMORANDUM

SUBJECT: RCRA Implications of Treating Gases
Vented From Compressed Cylinders

FROM: John Skinner, Director
Office of Solid Waste (WH-562B)

TO: James H. Scarbrough, Chief
Residuals Management Branch
Region IV

This is in response to your November 28, 1984, memorandum regarding a facility built to treat fluorine (PO56) and other gases vented from compressed gas cylinders. You are correct in your application of the response to the letter to the Compressed Gas Association from Christopher Capper, dated November 6, 1981.

According to that letter, customers return cylinders to gas suppliers for refilling, not for disposal, and no waste is involved. If the gas supplier decides to discard the contents of the returned cylinders, any liquid or physically solid waste removed from the cylinders are subject to RCRA if they are hazardous waste. Cylinders containing regulated quantities of hazardous waste would need to be manifested to off-site facilities for treatment, storage, or disposal. However, the letter goes on to say that the handling of gaseous residues removed from the cylinders and neutralization or scrubbing of gases prior to release are not subject to RCRA regulation. Any liquid or physically solid wastes derived from the treatment of hazardous compressed gas is still subject to RCRA regulations, if it is derived from listed waste or if the residual is hazardous under Part 261 Subpart C (characteristics).

Therefore, your conclusions are correct. The facility is not

a RCRA treatment facility for any handling of the gases removed from the cylinders. Any liquid or solid residues derived from the cylinders or from treatment of cylinder contents that are listed in 40 CFR 261 Subpart D or are hazardous under Part 261 Subpart C are subject to Subtitle C hazardous waste regulations. If you have any further questions, please do not hesitate to contact Alan Corson or Irene Horner, of my staff, at 382-4770.

cc: Hazardous Waste Branch Chiefs, Regions I-III and V-X