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List of RCRA Online Documents Relating to Commercial Chemical Products

The table provided below lists a number of RCRA Online documents that pertain to the regulations of commercial chemical products (“CCPs”) under RCRA.

The documents are listed in date order. Each row represents a different document. The first column in each row provides the date of the document in YYYY-MM-DD format. Note that dates with a “00” in the “day” portion of the date indicates a document that did not have a specific date of the month associated with it (these were usually EPA RCRA Hotline Summary Reports).

The second column in each row provides the unique “RCRA Online Number” associated with each document. Each of these numbers has a live link embedded in it that takes you to the “memo detail” for the document on the EPA website when you click on it. The memo detail gives you basic information about the document, including a synopsis of it. To view the actual document, click on the PDF symbol on the document summary page.

The third column in each row provides a brief description of the subject or topic of the particular RCRA Online document. Please be advised that this description is not intended to be a complete summary of the information in the document, but merely provides general information about the subject matter of the document.

Note: this list is not necessarily exhaustive or complete. You may wish to do a more specific search on RCRA online for the particular issue or topic in which you are interested. In addition, some of the interpretations in the documents in this list may have been superseded by later EPA interpretations or rulemakings. Check the memo detail for the document for information about whether or not some or all of the document may have been superseded.

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1980-09-04	12004	Wastes containing U- or P-listed chemicals are not hazardous waste if they are not unused products.
1980-11-17	12012	Products that contain listed CCPs, such as railroad ties or asbestos insulation, are not listed CCPs when they are discarded. Point of generation for CCPs is when they are discarded.
1980-11-18	11004	Rinsate from a listed CCP container is hazardous waste via the mixture rule.
1981-03-12	12024	Manufacturing wastes that contain U or P-listed constituents are not U or P wastes.
1981-05-07	11011	Normal use of a chemical is not disposal of a U or P waste.

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1981-05-13	11012	A CCP becomes a hazardous waste when it is discarded or intended to be discarded.
1981-09-18	11021	Diluted Aldicarb solution is P070 if it is the sole active ingredient; applicability of the farmer exclusion.
1983-02-00	12090	Virgin benzene spilled into groundwater is hazardous waste if generated after 11-19-1980.
1983-03-12	11026	P-and U-listings do not apply to manufacturing process wastes with compounds listed in 261.33.
1983-08-00	12130	Regulatory status of U-listed anti-neoplastic drugs.
1983-11-00	12152	Perchloroethylene in a transformer is U210 if it leaked prior to going into service.
1983-11-00	12155	Salts and esters of CCPs are not hazardous waste unless included in the listing.
1984-05-30	12238	Formaldehyde used as a biocide in ship ballast is not a U waste.
1984-06-06	12252	Portable toilet deodorizer with formaldehyde is not U122 (not sole ingredient).
1984-08-00	12276	Reclaimed trichloroethane that is disposed of is U226.
1984-11-29	12337	Potato starch treated with formaldehyde preservative is not U or P-listed hazardous waste.
1984-12-24	12299	Rinsates from P-listed CCP containers are hazardous waste under the mixture rule.
1985-01-16	12363	Airbag containing sodium azide is not P105 (sodium azide is not sole active ingredient).
1985-02-00	12357	Soil contaminated with chlordane is only U036 if the chlordane is spilled or discarded prior to use.
1985-04-10	12393	Virgin perchloroethylene mixed with a surfactant is U210, but not if reclaimed.
1985-05-14	11076	U122 listing does not apply to used formaldehyde or fish containing a formaldehyde preservative.
1985-05-17	12406	Used embalming fluid with formaldehyde is not U221.
1985-06-27	12423	Contaminated DEHP and spill cleanup residues from manufacturing are U028, but used ballast are not.
1985-07-01	11087	Applicability of RCRA to secondary materials that are bona fide products and are stored on the land.
1985-07-16	11094	U051 does not apply to creosote-treated crossties being disposed of.
1985-07-22	11096	Status of unused pesticides and pesticides wastewaters as CCP wastes.
1985-08-09	11099	Fuel in a used torpedo that is contaminated with saltwater is an off-specification CCP and is not a solid waste when reclaimed.
1985-09-10	12455	Rinsates from cleaning containers that formerly held 2,4,5-T and other pesticides are an acute hazardous waste.
1985-10-31	12486	Military munitions are CCPs and are not waste until a decision is made to discard. A deactivation furnace is an incinerator.
1985-11-01	12489	If a spilled CCP has more than one active ingredient, the spill residue is not a U or P-listed hazardous waste.
1985-12-13	11115	Status of unused pesticides and pesticides wastewaters as CCP wastes.

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1986-02-12	11130	An un-rinsed container which contained unused pentachlorophenol (PCP) is F027, and is subject to all regulations applicable to acute hazardous waste.
1986-03-03	11135	Spent carbon used to treat groundwater contaminated by product pentachlorophenol spill is acute hazardous waste F027.
1986-03-08	12578	ROL - off-spec jet fuel burned as kerosene is not a solid waste.
1986-03-19	11138	Gas or oil and water mixtures are not solid waste when reclaimed to produce fuels.
1986-04-02	11142	Unused, off-spec and broken mercury thermometers are not solid waste when reclaimed.
1986-04-07	12605	A summary of EPA regulations applicable to releases from wood preserving facilities, including the applicability of the F027 listing.
1986-04-28	11147	Mixtures of CCPs that are reclaimed and reused are not solid waste.
1986-05-02	11151	F-listings do not apply to CCPs that contain F-listed ingredients.
1986-06-03	11161	Spills of U or P-listed CCPs in a warehouse are hazardous waste unless immediately cleaned up.
1986-09-04	11177	P010 does not apply to reject vanadium pentoxide substrates, since they have been used.
1986-09-15	11180	Discarded paint containing xylene is not U239.
1986-09-29	11182	Soil contaminated with Chlordane as a result of normal application is not U036.
1986-10-21	11187	A mixture of unused pentachlorophenol (PCP) formulation (F027) and used PCP formulation that is spilled, disposed, or intended for disposal, is F027 via the mixture rule.
1986-11-01	12773	The fuel-to-fuel exemption does not apply to fuels burned in incinerators.
1986-11-00	12778	Floating plastic balls used to control carbon disulfide emissions are P022 unless cleaned.
1986-12-08	11202	P006 listing does not apply to aluminum phosphide that has been used.
1986-12-23	12825	Listed or characteristically hazardous off-spec CCPs that are fuels are not solid waste when burned for energy recovery.
1987-03-11	11228	Chlordane- and heptachlor-contaminated soils are not U- or P-listed if they are contaminated from normal use.
1987-04-09	11235	In regards to the F027 listing, the word "used" includes formulations that have contacted wood or which remain in a dip or process tank after preservation. The formulations do not have to be spent to be classified as used.
1987-04-18	12903	Soil contaminated with discarded, unused 2,4,5-T is F027, but not soil contaminated with 2,4,5-T used as pesticide.
1987-04-30	12917	Rinsate generated while decontaminating materials that contain acute hazardous waste are acute hazardous waste.
1987-05-13	11246	40 CFR 261.7 regarding empty containers applies to all hazardous wastes, not just U and P wastes.
1987-05-18	11248	Spent carbon containing Phorate is a P094 waste.
1987-05-18	12924	Unused Phorate captured in carbon filters during production is P094 unless reclaimed.
1987-06-16	12946	Status of residue in vials of chemotherapy drugs.

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1987-06-19	11256	F021 is for pentachlorophenol (PCP) manufacturing wastes, not for wood-preserving wastes like dip tank bottom sludge or discarded pentachlorophenol (PCP)-treated wood.
1987-07-02	12970	Clarification of the federal policy on the disposal of dioxin and dioxin-contaminated material, and a description of F-listed dioxin wastes (F020, F021, F022, F023, F027, F028).
1987-07-22	11267	Burning a material in fire training exercise is use of a product if it is a fuel.
1987-08-01	12996	A commercial chemical product (CCP) that has exceeded its shelf life can be shipped back to the manufacturer for reclamation without a manifest. An unused chemical remains a CCP (not solid waste) until such time that the manufacturer discards or intends to discard it.
1987-09-09	11291	Status of materials contaminated with U- or P-listed pesticides.
1987-09-23	11295	Wood chips and sawdust from wood treated with Noxtane pentachlorophenol formulation are not F- or K-listed. They could be characteristic. Discarded CCP Noxtane is F027 due to the pentachlorophenol active ingredient.
1987-12-00	13097	Incidental spills of virgin solvent discharged to a wastewater treatment unit are exempt under de minimis loss rule.
1988-01-14	11320	Ash from burning sand and hexachloroethane in an incinerator trial burn is U131 via the derived-from rule.
1988-01-20	11321	U-listed product residuals mixed together results in a waste with multiple U listings.
1988-04-14	11340	Discarded paint with solvent content is not F-listed.
1988-04-25	11343	Diluted, unused P or U-listed antineoplastic drugs are hazardous waste if the drug is the sole active ingredient
1988-05-03	11348	Chlordane and heptachlor - active ingredient, discard, technical grade, etc.
1988-05-05	11349	ROL - Paints that contain F001-F005 solvents as ingredients are not F-listed
1988-05-19	11350	U and P codes only apply to unused CCPs with sole active ingredient, not spent solvents
1988-07-27	13208	Solvent compounds are exempt under 40 CFR 261.2(c)(2)(ii) if they are themselves fuels.
1988-07-31	11360	Unused off-spec jet fuel is a CCP and not a solid waste when reclaimed to produce new jet fuel.
1988-09-00	13225	Non-empty aerosol cans that contain a listed or characteristically hazardous CCP are hazardous waste.
1988-09-19	11370	Q&A regarding the handling of explosives and commercial fuels.
1988-10-27	11374	Rinsing non-empty containers that held P- or U-listed pesticide CCPs renders the rinsate a listed hazardous waste.
1988-11-02	11378	Whether or not mercury-containing articles are U151 depends on contamination and usage.
1989-02-22	11398	A CCP that is abandoned is a solid waste, but not a CCP being reclaimed.
1989-03-10	13266	Beryllium dust from grinding and polishing is not P015.
1989-03-14	11405	Formaldehyde and paraformaldehyde preservatives in pesticides are not active ingredients

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1989-03-14	<u>13265</u>	Burning commercial fuel in fire training exercises is not regulated under RCRA.
1989-03-20	<u>11409</u>	Canceled dinoseb herbicide is a waste at point it is to be sent for disposal.
1989-04-14	<u>11419</u>	Used ignitron tubes sent off-site for mercury reclamation are a spent material and a solid waste, not a CCP.
1989-04-21	<u>11459</u>	An unused CCP that is contaminated can still be an off-specification species and a hazardous waste.
1989-06-28	<u>11437</u>	A chemical made in a lab is a CCP and could be P- or U-listed; diluted lab standards are also CCPs and could be listed.
1989-07-21	<u>11447</u>	U and P listings do not apply to rinsates from tanks trucks that are empty according to 40 CFR 261.7.
1989-07-31	<u>11449</u>	Off-spec jet fuel reclaimed into a fuel product is not a solid waste.
1989-08-01	<u>13310</u>	Unused mercury thermometers are not U151 (manufactured article).
1989-08-02	<u>11451</u>	Used CFC refrigerants are neither F nor U or P wastes.
1989-09-28	<u>11471</u>	A CCP solvent contaminated with another product during packaging is a hazardous waste.
1989-10-05	<u>11473</u>	Clarifications regarding the scope of the P001, U036 & U051 listings.
1989-11-01	<u>13335</u>	40 CFR 261.33 applies to all CCP spills regardless of where they occur.
1990-02-09	<u>11489</u>	RCRA status of various formulation of Dinoseb as P020 waste.
1990-02-14	<u>11492</u>	Status of cancelled pesticide Chlordimeform if returned to the manufacturer, discarded, intended for discard, or burned as a fuel.
1990-03-00	<u>13356</u>	Unused, off-spec PC boards are CCPs.
1990-03-22	<u>11501</u>	A CCP that can no longer can be used for its intended purpose is a solid waste.
1990-03-29	<u>13364</u>	Residues from incinerator trial burn using carbon tetrachloride and chlorobenzene are U211 and U037 wastes.
1990-05-01	<u>13372</u>	Unused mercury thermometers are CCPs, but not used ones. Status of spills from thermometers.
1990-05-03	<u>11513</u>	Spent spray booth filters with paints containing toluene or xylene are not F-listed.
1990-06-13	<u>11521</u>	Clarification of what commercially pure and technical grade means for the P and U-lists.
1990-06-14	<u>11523</u>	RCRA classification of laboratory standards as CCP waste.
1990-07-03	<u>11535</u>	Creosote-treated crossties are not covered by any hazardous waste listing.
1990-08-20	<u>11553</u>	Xylene and pesticide constituents in a manufacturing process waste does not necessarily trigger hazardous waste listings.
1990-10-18	<u>11565</u>	Used refrigerants are spent materials, not CCPs.
1990-11-28	<u>13431</u>	Unused surplus chemicals are classified as commercial chemical products (CCPs), and are not solid wastes until a decision is made to discard them.
1991-02-13	<u>11584</u>	Unused batteries are CCPs; discussion of used batteries as spent materials.
1991-05-16	<u>11606</u>	Unused pharmaceuticals sent to a reverse distributor are not discarded because no decision has been made to discard them.
1991-06-14	<u>11615</u>	Petroleum-water mixture that is reclaimed is not a solid waste; reclamation must be legitimate.
1991-08-00	<u>13490</u>	Unused circuit board are a CCP and not a solid waste when reclaimed.

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1992-02-19	14503	Absorbent pads reclaimed for fuel value are not solid waste; status of spills and characteristically hazardous CCPs.
1992-03-00	13530	Functionally inert components are not active ingredients.
1992-04-23	11666	Off-spec, unused airbag inflators are CCPs; not a solid waste when reclaimed.
1992-06-16	13545	Americium-beryllium sealed sources are not P015.
1992-08-24	11687	P- and U-listings apply to all CCPs with the generic names listed in 261.33, regardless of CAS numbers.
1992-10-15	13568	Carbon tetrachloride product released from a tank and contaminated soil are U211.
1992-11-00	13572	Reclaimed creosote and creosote-contaminated soil are U051 if discarded.
1992-11-02	11706	Status of equipment contaminated with beryllium dust as P015 waste.
1992-11-17	11711	Wool blankets treated with DDT are not U061.
1992-11-25	11713	Recovered free product fuel is solid waste if discarded; not solid waste if burned for energy recovery or reclaimed. CCPs include characteristically hazardous CCPs as well as listed CCPs.
1992-12-30	11717	Unused propellants from aerosol cans that are burned for energy recovery are eligible for the fuel-to-fuel exemption.
1993-02-03	11726	CCPs include all types of unused commercial products, not just chemicals; discussion re legitimacy.
1993-05-06	11747	Clarification of the term “when” as used in 261.2(c)
1993-06-00	13611	Unused Agent Orange is F027 because it contains 2,4,5-T.
1993-09-00	13622	Nitroglycerin pills as CCPs.
1993-11-05	11794	Wastes generated in natural gas are CCPs after it leaves the gas plant.
1994-03-00	13658	Paraformaldehyde is off-spec formaldehyde and a U122 waste.
1994-03-31	11824	Used mercury switches and relays are spent materials.
1994-06-08	11842	Status of DEHP removed from ballast as U028.
1994-07-11	11848	Characteristically hazardous off-spec fuels are not solid waste when burned for energy recovery due to the fuel-to-fuel exemption.
1994-07-11	11849	Outdated resins are off-specification CCPs and are not solid waste when recycled.
1994-08-02	13691	Unused formulations containing sodium pentachlorophenolate are F027 wastes.
1994-08-30	11868	Continued use of a high purity product is not a waste management activity.
1994-12-00	13718	Epinephrine residue in a syringe is not P042.
1994-12-13	11891	Unused mercury-cadmium batteries are CCPs & not solid waste when reclaimed.
1994-12-16	13722	Bubbler canisters containing unused phosphorous oxychloride is a not a solid waste when reclaimed.
1995-02-06	11938	How a fuel becomes off-spec is generally not relevant for applicability of the fuel-to-fuel exemption, unless it has been mixed with hazardous waste.
1995-05-00	13743	Intent to recycle a CCP spill residue isn't enough to make it exempt; generator has burden of proving legitimate recycling.
1995-08-24	11943	Residues in empty containers of U- or P-listed compounds are hazardous waste.
1995-09-00	13760	Isomers of P- and U-listed wastes.

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1995-09-14	<u>11917</u>	Unused, off-spec lead plates from lead-acid battery production are not solid waste when reclaimed.
1996-08-00	<u>14012</u>	U and P lists do not apply to manufactured articles; they are only hazardous if they are characteristically hazardous.
1996-12-24	<u>14005</u>	Discarded products containing solvents or that had solvents added are not F-listed.
1997-06-00	<u>14109</u>	Unused solvent may be P or U-listed if the solvent was the sole active ingredient.
1997-07-24	<u>14095</u>	Status of various wastes from Warfarin manufacturing.
1998-01-06	<u>14194</u>	Classification of spilled toluene as a U220 waste.
1998-02-02	<u>14650</u>	A gasoline spill on the ground at a product storage facility could be a solid waste because the product has been discarded by being abandoned.
1998-04-06	<u>14175</u>	CCPs listed in 261.33 are hazardous waste regardless of CAS numbers.
1998-07-15	<u>14269</u>	Granular activated carbon used to capture methyl bromide that has been used is not U029.
1999-02-19	<u>14503</u>	Absorbent pads with petroleum products that are recovered are exempt as off-specification CCPs being reclaimed.
1999-04-12	<u>14468</u>	Unused mercury lamps are CCPs; not solid waste if reclaimed.
2002-08-08	<u>14609</u>	Crude sulfate turpentine is not a solid waste when burned for energy recovery because it is itself a fuel.
2002-12-00	<u>14656</u>	Unused solvent in a non-empty aerosol can could be a U or P waste.
2003-03-18	<u>14654</u>	Medicinal nitroglycerine is not P081 if it is not reactive.
2003-11-19	<u>14686</u>	Discussion of MSDS information and applicability of U-listed codes; waste must meet three criteria to be listed CCP.
2004-02-18	<u>14820</u>	Fertilizers with pesticides or herbicides are not U or P waste if the pesticide or herbicide is not the sole active ingredient.
2004-04-12	<u>14708</u>	Wastewaters from rinsing CCP containers are hazardous waste.
2007-02-13	<u>14762</u>	Safe Delivery Systems cylinders are containers holding unused CCPs, not spent materials.
2010-08-23	<u>14814</u>	Used toluene is a spent material, not a CCP. The fuel-to-fuel exemption does not apply.
2010-08-23	<u>14817</u>	Unused nicotine patches being discarded are P075.
2011-11-04	<u>14827</u>	Calculating hazardous waste generation rate for containers that held P-listed pharmaceuticals.
2012-02-17	<u>14831</u>	P046 listing does not include phentermine salts.
2013-05-14	<u>14837</u>	Checklist that can be used to determine whether CCPs are solid and hazardous waste.
2014-04-11	<u>14841</u>	RCRA import-export rules do not apply to unused dental x-ray materials from Mexico going to Canada for reclaim.
2015-05-08	<u>14850</u>	Regulation of e-cigarettes under RCRA as P075 wastes.
2015-05-08	<u>14851</u>	Applicability of P075 listing to the Knightshade nicotine reclamation process.
2016-02-17	<u>14875</u>	One-quart limit for acute waste in satellite accumulation areas, including counting residues for empty containers.
2016-11-01	<u>14883</u>	Water-fuel mixture being reclaimed is not a solid waste since it is a CCP being reclaimed.

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
2017-02-17	<u>14887</u>	An unused nitrous oxide inhaler is P078.
2017-07-06	<u>14892</u>	Safe handling, storage, and treatment of discarded fireworks.
2017-07-19	<u>14894</u>	Unused cigarettes and cigars are not P075.
2018-07-19	<u>14920</u>	RCRA status of unused and used recalled airbags.
2019-10-17	<u>14915</u>	EPA interpretative memo regarding reverse distribution and reverse logistics facilities.