



*CIRCULATE*

*Return to Horst*

*Permit Mod?*

*Waste Codes?*

*Quantities?*

*Handling?*

October 24, 1991  
RPW 91-308

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Edward L. Horst  
Program Manager  
State of New Mexico  
Environment Department  
Harold Runnels Building  
1190 St. Francis Drive  
P.O. Box 26110  
Santa Fe, NM 87502

RE: Spent Antifreeze: Classification as Ha. ...

Dear Mr. Horst:

Enclosed please find a letter sent to Mr. Don R. Clay, U.S. EPA, regarding Safety-Kleen's classification of spent antifreeze as a hazardous waste due to data generated using the Federal Toxicity Characteristic Leaching Procedure (TCLP). Attached to this letter is a report which summarizes data from over 100 samples which show antifreeze is TCLP hazardous for lead and perchloroethylene.

Note that Safety-Kleen has notified its antifreeze customers that Safety-Kleen will handle the spent antifreeze as hazardous waste. Safety-Kleen will handle spent antifreeze as a non-hazardous waste only if the customer can provide TCLP data which establishes that the specific shipment is not hazardous.

If you have any questions, please do not hesitate to call me at (714) 593-3985.

Sincerely,

*Robert P. Wachsmuth*  
Robert P. Wachsmuth  
Environmental Engineer  
Denver Region

*Enclosure  
not  
found*

RPW:rg

cc J. Bard  
B. Constantelos  
R. Peoples  
Elgin - S-K Chrono File  
Branch 7-008-01