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## List of RCRA Online Documents Relating to Commercial Chemical Products

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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 In addition, some of the interpretations in the documents in this list may have been superseded by later EPA interpretations or rulemakings. Check the memo detail for the document for information about whether or not some or all of the document may have been superseded.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	<a href="#">12004</a>	Wastes containing U- or P-listed chemicals are not hazardous waste if they are not unused products.
1980-11-17	<a href="#">12012</a>	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	<a href="#">11004</a>	Rinsate from a listed CCP container is hazardous waste via the mixture rule.
1981-03-12	<a href="#">12024</a>	Manufacturing wastes that contain U or P-listed constituents are not U or P wastes.
1981-05-07	<a href="#">11011</a>	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	<a href="#">11012</a>	A CCP becomes a hazardous waste when it is discarded or intended to be discarded.
1981-09-18	<a href="#">11021</a>	Diluted Aldicarb solution is P070 if it is the sole active ingredient; applicability of the farmer exclusion.
1983-02-00	<a href="#">12090</a>	Virgin benzene spilled into groundwater is hazardous waste if generated after 11-19-1980.
1983-03-12	<a href="#">11026</a>	P-and U-listings do not apply to manufacturing process wastes with compounds listed in 261.33.
1983-08-00	<a href="#">12130</a>	Regulatory status of U-listed anti-neoplastic drugs.
1983-11-00	<a href="#">12152</a>	Perchloroethylene in a transformer is U210 if it leaked prior to going into service.
1983-11-00	<a href="#">12155</a>	Salts and esters of CCPs are not hazardous waste unless included in the listing.
1984-05-30	<a href="#">12238</a>	Formaldehyde used as a biocide in ship ballast is not a U waste.
1984-06-06	<a href="#">12252</a>	Portable toilet deodorizer with formaldehyde is not U122 (not sole ingredient).
1984-08-00	<a href="#">12276</a>	Reclaimed trichloroethane that is disposed of is U226.
1984-11-29	<a href="#">12337</a>	Potato starch treated with formaldehyde preservative is not U or P-listed hazardous waste.
1984-12-24	<a href="#">12299</a>	Rinsates from P-listed CCP containers are hazardous waste under the mixture rule.
1985-01-16	<a href="#">12363</a>	Airbag containing sodium azide is not P105 (sodium azide is not sole active ingredient).
1985-02-00	<a href="#">12357</a>	Soil contaminated with chlordane is only U036 if the chlordane is spilled or discarded prior to use.
1985-04-10	<a href="#">12393</a>	Virgin perchloroethylene mixed with a surfactant is U210, but not if reclaimed.
1985-05-14	<a href="#">11076</a>	U122 listing does not apply to used formaldehyde or fish containing a formaldehyde preservative.
1985-05-17	<a href="#">12406</a>	Used embalming fluid with formaldehyde is not U221.
1985-06-27	<a href="#">12423</a>	Contaminated DEHP and spill cleanup residues from manufacturing are U028, but used ballast are not.
1985-07-01	<a href="#">11087</a>	Applicability of RCRA to secondary materials that are bona fide products and are stored on the land.
1985-07-16	<a href="#">11094</a>	U051 does not apply to creosote-treated crossties being disposed of.
1985-07-22	<a href="#">11096</a>	Status of unused pesticides and pesticides wastewaters as CCP wastes.
1985-08-09	<a href="#">11099</a>	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	<a href="#">12455</a>	Rinsates from cleaning containers that formerly held 2,4,5-T and other pesticides are an acute hazardous waste.
1985-10-31	<a href="#">12486</a>	Military munitions are CCPs and are not waste until a decision is made to discard. A deactivation furnace is an incinerator.
1985-11-01	<a href="#">12489</a>	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	<a href="#">11115</a>	Status of unused pesticides and pesticides wastewaters as CCP wastes.

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

Date (YYYY-MM-DD)	RCRA Online #	Subject/Topic
1987-06-19	<a href="#">11256</a>	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	<a href="#">12970</a>	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	<a href="#">11267</a>	Burning a material in fire training exercise is use of a product if it is a fuel.
1987-08-01	<a href="#">12996</a>	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	<a href="#">11291</a>	Status of materials contaminated with U- or P-listed pesticides.
1987-09-23	<a href="#">11295</a>	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	<a href="#">13097</a>	Incidental spills of virgin solvent discharged to a wastewater treatment unit are exempt under de minimis loss rule.
1988-01-14	<a href="#">11320</a>	Ash from burning sand and hexachloroethane in an incinerator trial burn is U131 via the derived-from rule.
1988-01-20	<a href="#">11321</a>	U-listed product residuals mixed together results in a waste with multiple U listings.
1988-04-14	<a href="#">11340</a>	Discarded paint with solvent content is not F-listed.
1988-04-25	<a href="#">11343</a>	Diluted, unused P or U-listed antineoplastic drugs are hazardous waste if the drug is the sole active ingredient
1988-05-03	<a href="#">11348</a>	Chlordane and heptachlor - active ingredient, discard, technical grade, etc.
1988-05-05	<a href="#">11349</a>	ROL - Paints that contain F001-F005 solvents as ingredients are not F-listed
1988-05-19	<a href="#">11350</a>	U and P codes only apply to unused CCPs with sole active ingredient, not spent solvents
1988-07-27	<a href="#">13208</a>	Solvent compounds are exempt under 40 CFR 261.2(c)(2)(ii) if they are themselves fuels.
1988-07-31	<a href="#">11360</a>	Unused off-spec jet fuel is a CCP and not a solid waste when reclaimed to produce new jet fuel.
1988-09-00	<a href="#">13225</a>	Non-empty aerosol cans that contain a listed or characteristically hazardous CCP are hazardous waste.
1988-09-19	<a href="#">11370</a>	Q&A regarding the handling of explosives and commercial fuels.
1988-10-27	<a href="#">11374</a>	Rinsing non-empty containers that held P- or U-listed pesticide CCPs renders the rinsate a listed hazardous waste.
1988-11-02	<a href="#">11378</a>	Whether or not mercury-containing articles are U151 depends on contamination and usage.
1989-02-22	<a href="#">11398</a>	A CCP that is abandoned is a solid waste, but not a CCP being reclaimed.
1989-03-10	<a href="#">13266</a>	Beryllium dust from grinding and polishing is not P015.
1989-03-14	<a href="#">11405</a>	Formaldehyde and paraformaldehyde preservatives in pesticides are not active ingredients

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

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



<b>Date (YYYY-MM-DD)</b>	<b>RCRA Online #</b>	<b>Subject/Topic</b>
1995-09-14	<a href="#">11917</a>	Unused, off-spec lead plates from lead-acid battery production are not solid waste when reclaimed.
1996-08-00	<a href="#">14012</a>	U and P lists do not apply to manufactured articles; they are only hazardous if they are characteristically hazardous.
1996-12-24	<a href="#">14005</a>	Discarded products containing solvents or that had solvents added are not F-listed.
1997-06-00	<a href="#">14109</a>	Unused solvent may be P or U-listed if the solvent was the sole active ingredient.
1997-07-24	<a href="#">14095</a>	Status of various wastes from Warfarin manufacturing.
1998-01-06	<a href="#">14194</a>	Classification of spilled toluene as a U220 waste.
1998-02-02	<a href="#">14650</a>	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	<a href="#">14175</a>	CCPs listed in 261.33 are hazardous waste regardless of CAS numbers.
1998-07-15	<a href="#">14269</a>	Granular activated carbon used to capture methyl bromide that has been used is not U029.
1999-02-19	<a href="#">14503</a>	Absorbent pads with petroleum products that are recovered are exempt as off-specification CCPs being reclaimed.
1999-04-12	<a href="#">14468</a>	Unused mercury lamps are CCPs; not solid waste if reclaimed.
2002-08-08	<a href="#">14609</a>	Crude sulfate turpentine is not a solid waste when burned for energy recovery because it is itself a fuel.
2002-12-00	<a href="#">14656</a>	Unused solvent in a non-empty aerosol can could be a U or P waste.
2003-03-18	<a href="#">14654</a>	Medicinal nitroglycerine is not P081 if it is not reactive.
2003-11-19	<a href="#">14686</a>	Discussion of MSDS information and applicability of U-listed codes; waste must meet three criteria to be listed CCP.
2004-02-18	<a href="#">14820</a>	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	<a href="#">14708</a>	Wastewaters from rinsing CCP containers are hazardous waste.
2007-02-13	<a href="#">14762</a>	Safe Delivery Systems cylinders are containers holding unused CCPs, not spent materials.
2010-08-23	<a href="#">14814</a>	Used toluene is a spent material, not a CCP. The fuel-to-fuel exemption does not apply.
2010-08-23	<a href="#">14817</a>	Unused nicotine patches being discarded are P075.
2011-11-04	<a href="#">14827</a>	Calculating hazardous waste generation rate for containers that held P-listed pharmaceuticals.
2012-02-17	<a href="#">14831</a>	P046 listing does not include phentermine salts.
2013-05-14	<a href="#">14837</a>	Checklist that can be used to determine whether CCPs are solid and hazardous waste.
2014-04-11	<a href="#">14841</a>	RCRA import-export rules do not apply to unused dental x-ray materials from Mexico going to Canada for reclaim.
2015-05-08	<a href="#">14850</a>	Regulation of e-cigarettes under RCRA as P075 wastes.
2015-05-08	<a href="#">14851</a>	Applicability of P075 listing to the Knightshade nicotine reclamation process.
2016-02-17	<a href="#">14875</a>	One-quart limit for acute waste in satellite accumulation areas, including counting residues for empty containers.
2016-11-01	<a href="#">14883</a>	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	<a href="#">14887</a>	An unused nitrous oxide inhaler is P078.
2017-07-06	<a href="#">14892</a>	Safe handling, storage, and treatment of discarded fireworks.
2017-07-19	<a href="#">14894</a>	Unused cigarettes and cigars are not P075.
2018-07-19	<a href="#">14920</a>	RCRA status of unused and used recalled airbags.
2019-10-17	<a href="#">14915</a>	EPA interpretative memo regarding reverse distribution and reverse logistics facilities.