



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Martin O'Malley
Governor

Shari T. Wilson
Secretary

Anthony G. Brown
Lieutenant Governor

Robert M. Summers, Ph.D.
Deputy Secretary

February 14, 2008

Mr. Dan Koons
C.I.Agent Solutions
11760 Commonwealth Drive
Louisville KY 40299

Dear Mr. Koons:

The Maryland Department of the Environment (the "Department") has completed review of the information you submitted on solidified hydrocarbons, received via email on February 5, 2008, requesting clarification on the regulation of disposal of small amounts of these hydrocarbon spill materials solidified with the use of the polymers marketed under the trade name of C.I.Agent at Maryland landfill facilities.

Based on review of the analytical data submitted, which shows no TCLP exceedances, the waste stream would be determined to be nonhazardous. If the waste does not meet any of the other characteristics of a hazardous waste, such as ignitability, corrosivity, or reactivity, and the waste contains no free liquids, as determined by the EPA method 9095 Paint Filter Liquids test, it could be disposed of in a municipal solid waste facility. Please be advised that municipal solid waste landfills cannot accept drums unless flattened.

Should you have any questions regarding this matter, please contact Ms. Alisyne Tumminia, Project Manager, at (410) 537-3318.

Sincerely,

Martha Hynson, Chief
Landfill Operations Division

MH:AT:sm

cc: Mr. Horacio Tablada
Mr. Brian Coblentz