



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



November 21, 2007

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

Dear Mr. Koons:

This is in response to your letter addressed to B. E. Montgomery, received October 22, 2007, regarding the proper disposal of solidified hydrocarbons from minor spills under Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). Your letter was referred to me for response on behalf of the Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division.

In your letter you state that the petroleum hydrocarbons are gasoline, diesel fuel, and motor oils that are collected from minor spills in boat bilges, underground vaults, and manholes. Your product is used to bind the petroleum to make it a solid. It is this solid material containing petroleum for which you are requesting disposal guidance.

Proper disposal requirements for the subject material can only be discussed after a determination is made whether the solidified material is a hazardous waste. In general, these petroleum products are not listed as hazardous waste and, therefore, would be regulated as hazardous waste only if they exhibit one or more hazardous waste characteristics. Solidified mixtures that are determined to be hazardous waste must be managed according to the applicable requirements in Part 111 of the NREPA. Solidified mixtures that are determined not to be hazardous waste may be disposed, if not otherwise prohibited, in a solid waste landfill in accordance with Part 115, Solid Waste Management, of the NREPA.

If you have further questions or need additional information, please contact me at the telephone number below.

Sincerely,

Jack Schinderle
Hazardous Waste Section
Waste and Hazardous Materials Division
517-373-8410

cc: Ms. De Montgomery, MDEQ
Mr. Duane Roskoskey, MDEQ