Little Rock
Rogers
Jonesboro
Austin
MitchellWilliamsLaw.com

Mitchell, Williams, Selig, Gates & Woodyard, P.L.L.C.

Polyurethane Processing: American Chemistry Guidelines for Management and Disposal of Hazardous Wastes



Walter Wright, Jr. wwright@mwlaw.com (501) 688.8839

02/28/2018

The American Chemistry Council ("ACC") issued a guidance document titled:

Guidelines for Management and Disposal of Hazardous Wastes from Polyurethane Processing ("Guidelines")

ACC states that the purpose of the Guidelines are to:

... help downstream processors of polyurethane chemicals (referred to hereafter as processors) manage and dispose of resulting waste chemicals (hazardous) and empty containers in a manner that conforms to federal regulations.

The *Guidelines* provide a detailed summary of the Resource Conservation and Recovery Act Subtitle C regulations addressing issues such as:

- What is a Hazardous Waste?
- Listed Wastes
- Characteristic Wastes
- Mixture Rule
- Exclusions/Empty Containers
- Hazardous Waste Generator Responsibilities
- · Recordkeeping Requirements
- Storing Hazardous Waste
- Satellite Accumulation
- Hazardous Waste in a Designated Central Accumulation Area
- Disposing of Hazardous Waste
- On-Site Disposal Treatment

The *Guidelines* reference various polyurethane chemicals in its discussion of the Resource Conservation and Recovery Act requirements.

A copy of the Guidelines can be downloaded here.