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## **CUSTOMER ADVISORY**

### **RETURNED PERFUME PRODUCTS & DRUMMED WASTE ETHANOL CAN BE EXEMPT FROM FEDERAL HAZARDOUS WASTE REGS**

#### **Reclaiming the ethanol lets you avoid the hassles & cost of RCRA hazardous waste management & reporting**

A perfume manufacturer who is a customer of ours uses a solution of 70% industrial ethanol in water to flush process piping of residual fragrance between product runs. The spent ethanol solution is then collected in drums.

The same customer also accumulates bottles of perfumes and colognes that are either returns from retailers or rejects from the filling process.

We helped our customer achieve exemptions from Federal hazardous waste regulations by reclaiming the ethanol from both the waste drums and the retail packages. This saved them a considerable amount of money and time.

*Federal regs apply differently to the two types of waste.* Under 40 CFR 261.6(a)(3), the spent industrial ethanol, because it was recycled from our customer's drums, is excluded from all Federal hazardous waste management regulations. This means that our customer was not required to have an EPA ID number, apply hazardous waste markings to the containers, use a manifest or obtain a RCRA permit for treatment, storage or disposal.

The returned perfume and colognes are considered "commercial chemical products" as the EPA interprets that term. Under 40 CFR 261.2(c), commercial chemical products are excluded from the definition of "solid waste" if they are reclaimed. Since they are not considered solid waste, these products cannot be regulated as hazardous waste. Therefore none of the hazardous waste management requirements apply.

*MXI's process can reclaim ethanol from both packaged perfumes and drummed wastes.* Bottled perfumes are loaded into MXI's proprietary equipment where the containers are crushed. The crushed glass or plastics are recycled or landfilled. The alcohol-containing liquid is pumped off to storage tanks where it is combined with the waste ethanol from drums.

The combined waste stream is either recycled by distillation onsite or pumped to tank trucks for transport to a facility approved by the ATF (US Dept. of Alcohol Tobacco & Firearms) to handle ethanol. MXI issues certificates of recycling for ethanol-based products and certificates of disposal for landfilled or incinerated materials.

*Can MXI's reclamation process work for your returned perfumes or waste ethanol?* If your state has adopted federal hazardous waste regulations, then MXI may be able to save you from the hassles of hazardous waste management and reporting. For more information, call Ron Potter, MXI Environmental Services, at 732.424.8441, extension 101.