3M Internal Correspondence

To: MISAO SHIBA[JAYG01.JA034843] @ HOSTMAIL Misao Shiba/JA-Japan/3M/US

cc: DALLAS ZIMMERMAN[USSP01.US088010] @ Hostmail KARON ARMSTRONG[USSP01.US263645] @ Hostmail KENNETH GOEBEL[USSP01.US019959] @ Hostmail TIM KOENIG[ALLIN1.US266630] @ Hostmail MICHAEL MCNAMARA[USSP01.US269595] @ Hostmail Daryl C. Huggett/ET-ET&S/3M/US

From: Eric A. Reiner/ET-ET&S/3M/US

Date: 09/17/96 10:47 AM

Subject: Re: RCRA

Misao Shiba-San,

I am sending this to both your Lotus Notes and Profs addresses. Sorry that it has taken me so long to get back to you.

I am not aware of any 3M fluorinated compounds that are specifically listed as hazardous in RCRA. Daryl Huggett, our ET&SS (Environmental Technology and Safety Services) resident expert on RCRA or Tim Koenig, a representative from SCD on the copy list, can correct me if they happen to know that I am wrong.

Some 3M fluorochemicals, however, would be included in certain RCRA hazardous waste categories because of their characteristics or usage.

We have the Title 40 of the U.S. Code of Federal Regulations (40 CFR) on our computer system. Using Lotus Notes, I will forward (separately from this memo) those lists and those hazardous waste descriptions from 40 CFR that I think could be useful to you. Let me know if the lists I forward do not meet your needs.

Best regards,

Eric

From: Misao Shiba E-mail:mshiba@mmm.com S/3M Corporate Technical - Sagamihara Japan Tel: 81-427-79-2283 Fax: 81-427-74-4328

Subject: RCRA

I had a request from our costumer to examine whether Fluorinated Compounds are regulated by Resource Conservation Recovery Act of your contry. Could you let me know it. Or could you coordinate so that I can have a answer for that.

I have tried to list up all chemicals in RCRA-8, RCRA-U, RCRA-P in PRISM but it was unavailable. Could you tell me if you can print out all regulated chemicals in those restrictions.

I would like to have those chemicals here. If you can send it me by Lotus Note, please!

And if you can, could you send me Cord of Federal Regulation of EPA in which those regulations are described.

Thank you for your help.

cc: US088010--USSP01 ZIMMERMAN, DALLAS US263645--USSP01 ARMSTRONG, KARON





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From: Eric A. Reiner/ET-ET&S/3M/US

Date: 09/17/96 03:17 PM

Subject: RCRA information sent to Shiba-San

Misao Shiba-San,

Below are the sections of 40 CFR dealing with RCRA that I sent to you.

Best Regards,

Eric

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x 261.1 Purpose and scope.

x 261.2 Definition of solid waste.

x 261.3 Definition of hazardous waste.

x 261.10 Criteria for identifying the characteristics of hazardous waste.

× 261.11 Criteria for listing hazardous waste.

x 261.21 Characteristic of ignitability.

× 261.22 Characteristic of corrosivity.

× 261.23 Characteristic of reactivity.

x 261.24 Toxicity characteristic.

× 261.30 General.

x 261.31 Hazardous wastes from non-specific sources.

x 261.32 Hazardous wastes from specific sources.

x 261.33 Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof.

APPENDIX VII TO PART 261-BASIS FOR LISTING HAZARDOUS WASTE

APPENDIX VIII TO PART 261-HAZARDOUS CONSTITUENTS

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