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United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

April 23, 1993

MEMORANDUM

SUBJECT: Interpretation of "Aqueous" as Applied to the
Corrosivity Characteristic (40 CFR 261.22)

TO: Joseph R. Franzmathes, Director
Waste Management Division

FROM: David Bussard, Director
Characterization and Assessment Division

This memorandum responds to your memorandum to Bruce Diamond dated March 11, 1993 requesting clarification of the term "aqueous" as it applies to the corrosivity characteristic. Your memorandum references a September 1992 "Hotline Questions and Answers" publication produced by the RCRA/Superfund Hotline contractors and concurred upon by my Division and by OSW.

The Hotline publication correctly defines "aqueous," for the purposes of the corrosivity characteristic, to mean in a form amenable to pH measurement. This interpretation is consistent with the supporting documentation found in the background document for the corrosivity characteristic final rulemaking (Background Document: Section 261.22 - Characteristic of Corrosivity, May 2, 1980). I have attached the applicable section for your information.

A more specific interpretation of "aqueous" for the purpose of the corrosivity characteristic may be found in the method referenced in the actual regulatory text for the corrosivity characteristic at 40 CFR 261.22(a)(1). The regulation states that "[the EPA test method for pH is specified as Method 5.2, in "Test Methods for the Evaluation "of Solid Waste, Physical/Chemical Methods" (see attachment). Method 5.2, pH Electrometric Measurement, which was renumbered to Method 9040 specifies under scope and application that the method "is used to measure the pH of

aqueous wastes and those wastes where the aqueous phase constitutes at least 20% of the total volume of "waste." Therefore, any waste for which this method is applicable must contain at least 20% free water by volume. This method is also attached for your information.

If you or your staff should have any questions regarding this memorandum, please call me or have your staff call Al Collins, of my staff, at 202-260-4791.

Attachments