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IGNITABLE SOLID DEFINITION APPLIED TO TITANIUM SWARF

JAN 10 1983

RE: WCBDF0345

MEMORANDUM

SUBJECT: Ignitable Solids Definition

FROM: John H. Skinner, Acting Director  
Office of Solid Waste (WH-562)

TO: David A. Wagoner, Director  
Air and Waste Management Division, Region VII

As you requested in your memo of December 15, I am writing to clarify the definition of an ignitable solid under 40 CFR 261.21 as it applies to materials such as titanium swarf.

As Gene Crumpler correctly advised Greg Weber of Region V, in order for a solid waste to be an ignitable waste it must be capable, under standard temperature and pressure, of both causing fires through friction, absorption of moisture or spontaneous chemical changes and burn so vigorously and persistently that it creates a hazard. Thus, if the titanium swarf is very difficult to ignite it would not be classified as a hazardous waste even though, once ignited, it may pose a hazard.

In order to remove the ambiguities inherent in such a definition, OSW is in the process of developing specific testing methods and hazardous waste definition threshold for ignitable solids. However, such tests are not expected to be ready for proposal until FY 84.

If you have any comments or questions concerning the ignitable waste definition please give David Friedman or Florence Richardson a call at FTS 382-4770.

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