An aqueous waste containing small amounts of an organic compound flashes in a Pensky-Martens Closed Cup Tester. Is this waste RCRA ignitable or is it excluded from that definition because it "contains less than 24% alcohol?"

The waste has no alcohol in it.

If an aqueous waste contains no alcohol, it is not excluded from the definition of ignitable as is wine or latex paint. Hence, if the flashpoint is less than 140 F, the aqueous waste is deemed ignitable, EPA is working on developing a test for such wastes to determine if they could sustain combustion or only flash in the Closed Cup Tester.

Source: Florence Richardson
Research: Denise Wright