

CHARACTERISTIC OF IGNITABILITY

APR 16 1987

Mr. David L. Bumgarmer  
Kemron  
200 Putnam Street  
Marietta, OH 45750

Dear Mr. Bumgarmer:

This brief note will respond to your letter of inquiry to David Friedman regarding the interpretation of the Characteristic of Ignitability, 40 CFR Part 261.21.

Your questions are repeated below with the appropriate response:

We have observed apparent flashes on solvent mixtures whose composition would imply they are nonflammable, i.e., 99% Freon 113 mixtures containing trace levels of cyclohexane. The flashes occur at low temperatures (20° - 40° C) and are usually not reproducible on the same aliquot. Should these initial flashes be reported as true Flash Points for RCRA characterization?

Yes, according to the present regulations.

Many solvent mixtures, including Freon 113, boil at temperatures below 60° C and cannot be properly evaluated by Pensky-Martens. How should such RCRA data be reported to agencies and other clients?

Only those liquids that flash are considered ignitable. Many clients request Flash Point data for soils and other solid materials. They indicate that waste haulers or state or Federal agencies are requiring much data. Does EPA have a standard policy on this matter?

Current test methods (40 CFR Part 261.21) are designed

for liquids only. At the present time there are no suitable, validated procedures for determining the ignitability characteristic of solid (non-liquid)

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wastes.

We hope these answers are sufficient for your use. If you have additional questions please feel free to call us.

Sincerely,

Florence M. Richardson  
Chemist, Methods Section

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