

Bob Lopez
PSC Environmental
1801 East Matzinger Road
Toledo, Ohio 43612

Dear Mr. Lopez:

Thank you for your letter of April 28, 2003, regarding flash point testing of a waste fibrous filter material. You asked what the proper SW-846 test method would be for determining the flash point of this material.

Under the Environmental Protection Agency's (EPA) hazardous waste regulations, only liquid wastes are evaluated for ignitability using a flash point test (40 CFR 261.21(a)(1)). Non-liquid wastes are assessed for their ignitability using the narrative criteria found at 40 CFR 261.21(a)(2), which reads:

(a) A solid waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:

(2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.

The Agency has not developed specific regulatory or guidance tests to implement this portion of the regulation. However, you should also check with your state environmental agency, as states may regulate more stringently than the federal government, or may have guidance for implementing this regulation.

I hope this answers your question about testing your waste fibrous filter material. If you have further questions please contact my office or call Gregory Helms at 703-308-8845, or email at: helms.greg@epa.gov.

Sincerely yours,

Robert Springer, Director
Office of Solid Waste

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