

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JANUARY 7, 1993

Mr. David S. Parsons
Hazardous Waste Management Section
Bureau of Solid & Hazardous Waste Management
Wisconsin Department of Natural Resource.
101 South Webster Street, Box 7921
Madison, WI 53707

Dear Mr. Parsons:

This is in response to your November 18, 1992 letter requesting confirmation of information obtained from the RCRA/Superfund Hotline regarding the hazardous waste characteristic of corrosivity. Specifically, you were interested in the types of wastes for which the pH limits and the steel corrosion tests apply.

The information provided by the hotline is consistent with current EPA policy. Non-aqueous liquids need only be tested using the steel corrosion test, whereas aqueous liquids are subject to both the steel corrosion test and the pH limits. Likewise, aqueous non-liquids (e.g., gels) need only be evaluated for pH. Further, for purposes of the corrosivity definition, an "aqueous" waste is one that is amenable to pH measurement.

Should you have any further questions regarding this issue, or need any further clarification, please feel free to contact Ms. Gail Hansen, Chief of the Methods Section, at (202) 260-4761.

Sincerely,

David Bussard, Director
Characterization and
Assessment Division