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AGITATE SAMPLES EVALUATED USING METHOD 1110

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

JUN 29 1990

Mr. John W. Sutton
Sterlington Plant
IMC Fertilizer, Inc.
Box 626
Sterlington, LA 71280-0626

Dear Mr. Sutton:

I am writing in response to your recent letter to David Friedman requesting clarification of when and how to agitate samples being evaluated for corrosivity using Method 1110.

As section 7.3 indicates, the purpose of agitation is to ensure that the steel coupon is exposed to all the components of the waste mixture. While it is probably critical that non-homogeneous liquids be agitated by mechanical means during the coupon exposure period, as the NACE Standard TM-01-69 indicates, for homogeneous liquids of low viscosity, thermal currents may be sufficient to maintain solution homogeneity.

We have not conducted any studies to determine, in a quantitative manner, exactly when, and to what extent, agitation is needed to ensure homogeneity during the exposure period. The only guidance that I can offer is to use your professional judgement and use the mildest agitation that is consistent with the requirement of maintaining contact between the steel coupon and all components of the waste mixture.

I hope that the above discussion is helpful to you. If you have any quantitative data relating agitation rate to waste corrosivity, I would urge you to send it to us so that we may consider possible future revisions to Method 1110. If I may be of further assistance, I can be reached at (202) 475-6722.

Sincerely yours,

RO 13389

Original Document signed

Gail Hansen
Program Manager
Miscellaneous Methods
Methods Section (OS-331)

cc: Hotline