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9/9/88

MEMORANDUM

SUBJECT: Ignitability Characteristic

FROM: Sylvia K. Lowrance, Director  
Office of Solid Waste (OS-300)

TO: William E. Muno, Acting Associate Director  
Waste Management Division (5HS-13)

I am responding to your request for clarification of the phrase "under standard temperature and pressure" as used in the ignitability characteristic (40 CFR 261.21). The phrase refers to the conditions used to determine whether the waste is a liquid or solid. Wastes are evaluated at standard temperature (20 C/68 F) and pressure (1 atm) and, if not a liquid under these conditions are not subject to the flash point criteria of §261.21(a)(1).

Based on the information in your memorandum, Chevron's polystyrene production distillation still bottom tar would not be a liquid within the meaning of ignitability characteristic and therefore only evaluated against the criteria of §261.21(a)(2).

If you have any further questions, please contact David Friedman of my staff at (FTS) 382-4761.