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IGNITABILITY CHARACTERISTIC TESTING FOR SOLIDS

James W. Poirier
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1752 N. St., NW
Washington, DC 20036

Dear Mr. Poirier:

I am writing in response to your letter of December 1, 1989 regarding the ignitability characteristic.

The Office of Solid Waste (OSW) currently has two test protocols for determining the ignitability of a liquid - the Pensky-Martens Closed Cup (SW-846 Method 1010) and the Setaflash Closed Cup (SW-846 Method 1020). These methods are for liquids only and do not establish that a solid possesses the ignitable characteristic. For solids, there is only a narrative definition set forth in the regulation itself:

"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 OSW has been conducting work to develop test methods for ignitable solids. A method has been developed but has not been evaluated and no decision has been made on the appropriate regulatory thresholds. Presently, other priorities have resulted in the work being put on hold.

If you have any further questions, please contact Gail Hansen of my staff at (202) 475-6722.

Sincerely yours,

Devereaux Barnes
Director,
Characterization and Assessment Division

RO 13350

cc: Alec McBride
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