

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

APRIL 18, 1989

MEMORANDUM

SUBJECT: Request for Regulatory Interpretation by Reaction Thermal Systems, Inc. of Napa, CA.

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

TO: Karen V. Brown, Asbestos and Small Business Ombudsman Office of Small and Disadvantaged Business Utilization (A-149C)

This memo is in response to your request for a regulatory interpretation in behalf of the Reaction Thermal Systems, Inc. (RTS) regarding their proprietary REACTOL™ formula. According to the information supplied by RTS, their formula is not a listed waste (i.e., does not appear in 40 CFR 261.31-33). The information provided indicates the presence of 0.2% of potassium salts. The term "salts" is very vague and could possibly include such corrosion inhibitors as potassium chromate. RTS should make the determination whether their product, when disposed of, exhibits any of the characteristics of a hazardous waste (i.e., ignitability, corrosivity, reactivity, or extraction procedure (EP) toxicity--see 40 CFR 261.21-24).

Since RTS is located in California (not a RCRA authorized State), the company should communicate with both State and EPA Region IX authorities on this matter.

If we can be of further assistance, please call Ed Abrams at 382-4787.