

9443.1987(19)

AQUEOUS AS USED IN THE CORROSIVITY CHARACTERISTIC

SEP 14 1987

Mr. Stuart J. Gock
Environmental Coordinator
Printing Developments, Inc.
2010 Indiana Street
Racine, WI 53405

Dear Mr. Gock:

The following information is being provided in response to your letter of April 6, 1987, regarding the definition of aqueous as used in the Corrosivity Characteristic, 40 CFR Part 261.22(a)(1).

As you are aware, the corrosivity characteristic does not specifically define what constitutes an aqueous waste. However, we have developed guidance in defining the term "aqueous." In particular, we consider a waste to be aqueous if it has a liquid phase containing more than 50 percent water." (See attached letter from Dr. John Skinner, Director of the Office of Solid Waste, on February 26, 1985.) This position is currently in effect and you should use the 50 percent water cut-off as a basis for evaluating whether or not to test your wastes for corrosivity.

I should point out that we are considering reviewing this position, as well as the need for a regulatory definition of aqueous waste. Therefore, you should be aware that a regulatory definition of aqueous may be proposed at some point in the future.

If you have any additional questions, please do not hesitate to contact me.

Sincerely,

Robert Scarberry, Acting Chief
Waste Characterization Branch
Attachment

RO 13039