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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 27 1991

Aaron H. Goldberg, Esq.  
Beveridge and Diamond, P.C.  
Suite 700  
1350 I Street, N. W.  
Washington, D. C. 20005

Dear Mr. Goldberg:

Thank you for your letter of January 25, 1991 concerning our methods for ignitable liquids.

In defining an ignitable liquid hazardous waste under RCRA, the Agency's regulations state that flash point should be determined by either one of two specified methods, or by any other method which might be approved by the Administrator. Only one test method needs to be applied. The choice of the method should be based on the applicability of the method to the material being tested. In this case, one might consider viscosity, among other things, in making the appropriate choice.

I hope that this has clarified the intent. If you need further assistance, please call Charles Plost of my staff at (202) 382-7458.

Sincerely yours,

David Bussard, Director  
Characterization and Assessment Division

cc Steve Cochran  
Joe Freedman, OGC  
Joe Lowry, NEIC  
Hugh Davis, OWPE  
RCRA-Hotline

RO 11594