

JUL 12, 1985

MEMORANDUM

SUBJECT: Interim Thresholds for Toxic Gas Generation Reactivity (261.23(a)(5))

FROM: Eileen Claussen, Director Characterization & Assessment Division (WH-562B)

TO: Solid Waste Branch Chiefs, Regions I to. X

Over the past year, we have received many inquiries about how to evaluate wastes for reactivity (261.23(a)(5)). We have initiated a number of studies in this area, and expect to propose a quantitative threshold for toxic gas generation reactivity in December of this year. On an interim basis, however, we feel strongly that wastes releasing more than the following levels of toxic gas should be regulated as hazardous wastes:

Total Available Cyanide:	250 mg HCN/Kg waste
Total Available Sulfide:	500 mg H ₂ S/Kg waste

The available cyanide or sulfide should be measured using the attached draft testing methods. Work currently being done on the agitation and waste introduction steps may result in significant changes in the subsequent proposed test. However, pending the conclusion of the investigations, we recommend use of this draft procedure.

I have attached a brief outline of the methodology we have employed to derive these interim thresholds. Work on estimating dispersion factors, however, is currently in progress. Any comments or suggestions you may have with respect to either the draft test method or the approach to establishing thresholds would be appreciated.

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