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MEMORANDUM

SUBJECT: Waste that Exhibits Two Characteristics

FROM: Devereaux Barnes, Director
Characterization and Assessment Division

TO: Conrad Simon, Director
Air and Waste Management Division

This is in response to the October 23, 1989, letter from Christine McCulloch to Steve Cochran, and follows up on my memo of September 28, 1989 to you regarding Fisher Scientific. Apparently Fisher generates a nitric acid waste that is both an oxidizer (which makes it ignitable under RCRA rules) and is corrosive. If this is the case, then this waste is both D001 and D002. EPA Federal regulations do not require a generator to place waste codes on the manifest, but the waste must be managed in compliance with all special requirements for ignitable (e.g., 264.17) and corrosive waste.

Please feel free to give me a call at 8-382-4637 if you have any further question.

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cc: Christine McCulloch, Region II (Fax 264-4359)

bcc: Steve Cochran
Hotline