



EPA PROPOSAL TO CHANGE D001 IGNITABLE CHARACTERISTIC TEST METHOD

EPA has proposed three updates to the methods for determining if a waste is ignitable (waste code D001). The first update involves the flash point test methods required for determining if a liquid waste is an ignitable (D001) hazardous waste. Under the proposal, EPA will authorize ASTM standard D 8174-18 as an alternative to the current ASTM standard D 3278-78. The new test method no longer requires a mercury thermometer, uses electronic ignition sources and automated instrumentation for flash point testing.

In the second portion of the update, EPA also plans to codify existing guidance regarding the regulatory exclusion in the ignitable characteristic for aqueous liquids containing alcohols. EPA has proposed to revise the wording of the existing aqueous alcohol exclusion from "other than an aqueous solution containing less than 24 percent alcohol by volume" to "other than a solution containing less than 24 percent of any alcohol or combination of alcohols (except if the alcohol has been used for its solvent properties and is one of the alcohols specified in EPA Hazardous Waste No. F003 or F005) by volume and at least 50 percent water by weight." This proposed change removes the term "aqueous" from 40 CFR 261.21(a)(1), which is currently undefined in the RCRA hazardous waste regulations, and specifies what percentage of water defines the scope of this exclusion.

In the third portion of the update, EPA has proposed to add a new paragraph to 40 CFR 261.21(a) that clarifies how to properly test multiphase wastes containing multiple liquid(s) with or without solids for ignitability determinations. This added language would codify EPA's long-standing sampling guidance for multiphase wastes, which are wastes that, due to differences in density (e.g., oil/water) or physical form (e.g., solid/liquid), separate into two or more phases. EPA's long-standing sampling guidance states that for multiphase mixtures, a generator and laboratory should separate the sample into all of its different solid and/or liquid phases, to the extent practicable, and analyze each one individually in accordance with 40 CFR 261.21(a) to determine whether that phase exhibits the characteristic of ignitability.

Third, EPA is proposing to codify existing sampling guidance regarding waste mixtures having multiple phases when determining whether a waste exhibits the ignitability characteristic.

Finally, although unrelated to the ignitability characteristic, EPA proposed to provide alternatives to the use of mercury thermometers in the air sampling and stack emissions methods in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods (SW-846). Adding the option of using non-mercury thermometers in place of mercury thermometers would provide the regulated community with increased flexibility in their implementation of these required test methods. The use of alternatives to mercury thermometers is consistent with previous Agency actions and helps achieve the Agency's goal of minimizing the use of mercury.

EPA is accepting comments on the proposal until June 6, 2019. You can submit comments [here](#).

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