

OFFICE OF SOLID WASTE

JUNE 18, 1981

Mr. Arthur N. Nelson
Environmental Specialist
EL Paso Products Company
P.O. Box 3986
Odessa, TX 79760

Dear Mr. Nelson:

Your letter of June 11, 1981 to Jim Poppiti concerning Flash Point Testers has been referred to me for reply.

In your telephone conversation with Alan Corson he quoted the material on ignitability testing from FR 45, page 33121, section 261.21. It is your choice to use an equivalent test method after it has been approved by the Administrator according to the procedures set forth in FR 45, sections 260.20 and 260.21.

The Pensky - Martens and Setaflash Closed Cup Testers and the corresponding ASTM Standard methods - ANSI/ASTM D93-79 ASTM 3278-78, have been recommended by EPA for use in determining the flash point of ignitables. The Tag Closed Cup Tester is not considered suitable for wastes which are very viscous, skin over, tend to stratify or contain suspended solids.

Please contact us if you have any questions.

Sincerely yours,

Florence M. Richardson
Chemist
Waste Characterization Branch
Hazardous and Industrial Waste Division (WH-565)

FaxBack# 11015