



DIRECTIVE NUMBER: 9443.05(84)

TITLE: Blasting Caps as Reactive Wastes

APPROVAL DATE: 9-11-84.

EFFECTIVE DATE: 9-11-84.

ORIGINATING OFFICE: Office of Solid Waste

☒ **FINAL**

☐ **DRAFT**

STATUS:

- | | |
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| [] | A- Pending OMB approval |
| [] | B- Pending AA-OSWER approval |
| [] | C- For review &/or comment |
| [] | D- In development or circulating
headquarters |

REFERENCE (other documents):

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Key Words: Blasting Caps, Reactive Wastes

Regulations: 40 CFR 261.23

Subject: Blasting Caps as Reactive Wastes

Addressee: David Wagoner, Director, Air and Waste Management Division,
 Region VII

Originator: John Skinner, Director, Office of Solid Waste

Source Doc: #9443.05(84)

Date: 9-11-84

Summary:

Blasting caps fall within the definition of a reactive hazardous waste. 40 CFR 261.23 states that a waste which is capable of detonation or explosive reaction if subjected to heat or a strong initiating force is a reactive hazardous waste.

The notation in the SW-846 manual stating that blasting caps in quantities of less than 1000 are not hazardous wastes is incorrect and should be disregarded.

11 SEP 1994

MEMORANDUM

SUBJECT: Status of Blasting Caps as Reactive Wastes

FROM: John Skinner, Director
Office of Solid Waste (WH-562)

TO: David Wagoner, Director
Air and Waste Management Division
Region VII

This is in response to your recent memorandum requesting clarification of the definition of a reactive waste as it applies to out-dated blasting caps. According to 40 CFR 261.23, a waste which is capable of detonation or explosive reaction, if subjected to heat or a strong initiating force, is a reactive hazardous waste. Blasting caps clearly fall within that definition.

As you brought to our attention, Section 2.1.3 of "Test Methods for Evaluating Solid Waste" (SW-846) appears, however, to suggest otherwise. A note in the manual states that blasting caps in quantities of less than 1000 are not a hazardous waste. This is a mistake. SW-846 is a compilation of sampling and analytical methods that may be used to test for the presence of Appendix VII or VIII constituents. It is not, however, the basis on which the identification or listing of a particular material as a hazardous waste is made. Thus, Note 5 in Section 2.1.3 of SW-846, should be disregarded.

A package of revisions and updates to SW-846 is currently in preparation; as part of this update, Note 5 will be deleted to prevent future misunderstandings. We appreciate your bringing this problem to our attention. If you have any questions, please contact Florence Richardson of my staff. She can be reached at FTS 382-4801.



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