



Ken Rota

03/31/03 08:00 AM

To: [diane.maxwell@dla.mil](mailto:diane.maxwell@dla.mil)  
cc: Gary Gosbee/R1/USEPA/US@EPA, Sharon  
Leitch/R1/USEPA/US@EPA, Jeff Fowley/R1/USEPA/US@EPA  
Subject: Waste Aerosol Cans

Dear Ms. Maxwell,

I was forwarded an email/controlled correspondence from you requesting Region 1's position on adding the D003 (reactive) to waste aerosol cans containing other waste codes (i.e. D001). The question you pose does not represent a matter of regional interpretation and is a simple matter of proper waste determination under 262.11. If, during your hazardous waste determination procedures, you find that waste aerosol cans also exhibit the characteristic of reactivity, in addition to any other characteristics (typically ignitability, heavy metals and certain solvent constituents), then that additional waste code must be identified and, the waste, when manifested off-site, must be declared on the LDR notice (waste codes on a manifest are state requirements) along with the proper LDR treatment code. This position, as well as other EPA interpretations/explanations of the regulations are publically available on EPA's website found at <http://www.epa.gov/rcraonline>.

Sincerely,

Kenneth B. Rota, Chief  
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US EPA - New England Region  
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