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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 4 1987

Mr. Lundy Adelsberger  
Ohio Environmental  
Protection Agency  
P.O. Box 1049  
Columbus, OH 43266-0149

Dear Mr. Adelsberger:

I am writing to clarify how to determine allowable holding times when testing RCRA samples. Basically, the holding time for a given sample begins at the time the sample is generated.

For example, if one has to analyze a sample of ground water for volatile organics using Method 8010, the holding time specified in SW-846 is 14 days. This means that within 14 days from the time the sample of water was taken from the well, it must be analyzed using Method 8010.

If, on the other hand, one is to analyze a sample of ground water for semi-volatile organics using methods 3510 and 8270, the water must be extracted within 7 days (the holding time for Method 3510) and then the organic extract analyzed within 40 days from the time the water was extracted (the holding time for Method 8270 samples).

In summary, as long as the holding time for each sequential step in a determination is not exceeded, the holding time criteria is not exceeded and the determination is not considered invalid.

With respect to the testing of waste materials to determine whether or not they exhibit the characteristic of Extraction Procedure Toxicity things are slightly more complicated. The listed holding times apply to analytes in the matrix in which they will be determined. If mercury is to be determined in Method 1310 leachate (the Extraction Procedure), the 28 day holding time, listed in SW-846 for mercury, begins when the leachate is generated. There are no holding times established to govern the time between collection and leaching. The analyst, in conjunction with the customer or regulatory official, should use his past professional judgement in such cases.

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-2-

I hope this discussion clarifies the issue of holding time for you. If you have any additional questions, please contact Florence Richardson, of my staff, at 202/382-4778.

Sincerely yours,

David Friedman, Chief  
Methods Section (WH-562B)

cc: F. Richardson  
RCRA/CERCLA Hotline