UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 14, 1990

Mr. Richard S. Leonard
Quality Assurance Director
National Environmental Testing, Inc.
Woodland Falls Corporate Park
220 Lake Drive East
Suite 301
Cherry Hill, NJ 08002

Dear Mr. Leonard:

Thank you for your recent inquiry about Method 1311, and the interim period. The answers to your questions follow:

Question 1: For the period March 29th through June 28th inclusive, is the data generated by 1311 acceptable for regulatory/compliance decisions?

Answer: Yes.

Question 2: Section 8.2 of the June 29th edition of Method states that, “as a minimum, follow the matrix spike addition guidance provided in each analytical method”. For multicomponent organic analysis, SW-846 methods prescribe using a specified subset of the complied analysis list as the spiked components. How are the corrected values of Section 8.2.5, Xc’s, computed from these for the non-spiked compounds?

Answer: The matrix spike evaluates method performance vix recovery. Using the minimal list, requires you to choose the spike most closely related to the analyte. However, this does not necessarily prove compliance. Of course it is preferable to spike with the TCLP target analyte list. This absolutely answers the question of target analyte recovery and absolutely proves compliance.

Question 3: The matrix spike addition concentration guidance in the methods is different from method 1311 Section 8.2.1. How do we resolve these discrepancies?

Answer: When such a conflict exists, use the method guidance. Use the higher spike concentration guidance, which should be TCLP.

Question 4: Our clients complain that when we dilute a sample (e.g. oil or solvent matrix) to obtain results that meet quality control requirements, that the data so obtained are "useless" because of the high reporting limit. How do we generate analytical data for compliance decisions when dilutions must be performed?

Answer: There are situations when the laboratory is asked to perform an inappropriate test. The TCLP was not intended to be applied to oil or solvent matrices. The matrix itself is probably hazardous and can cause a flammability or explosivity characteristic test failure. Your client will be better served in this case by assuming his wastes to be hazardous, since the laboratory can not demonstrate non-hazardous with TCLP for these materials. Possibly, if the treatment your client intended were incineration, you would apply TCLP to the ash.

I hope these answers have been useful. If you would like further discussion, please feel free to contact me or Gail Hansen, or Jeanne Hankins of my staff. Our phone number is 202-382-4761.

Sincerely yours,

Alec McBride, Chief
Technical Assessment Branch

**NATIONAL
ENVIRONMENTAL
TESTING, INC.**

August 1, 1990

Dr. Alex McBride
Director of Technical Assessment
RCRA Program Office
United States Environmental Protection Agency
401 M Street
Washington, D.C. 20460

Dear Dr. McBride:

NET services clients that must begin to comply with the new TCLP rules published in the Federal Register on March 29, 1990. The analytical method, RCRA Method 1311 has been revised since that publication with the update appearing in the June 29, 1990 Federal Register. Our sixteen environmental analytical laboratories are currently experiencing substantial frustration with the current lack of clarity of the June 29th version of Method 1311 in an attempt to interpret the quality control requirements of Section 8 in the cited method. I am asking that you address the following questions in a timely written response:

1. For the period March 29th through June 28th inclusive, is the data generated under the March 29th edition of Method 1311 acceptable for regulatory/compliance decisions?

2. Section 8.2 of the June 29th edition of Method states that, “as a minimum, follow the matrix spike addition guidance provided in each analytical method”. For multicomponent organic analysis, SW-846 methods prescribe using a specified subset of the complied analysis list as the spiked components. How are the corrected values of Section 8.2.5, Xc’s, computed from these for the non-spiked compounds?

3. The matrix spike addition concentration guidance in the methods is different from method 1311 Section 8.2.1. How do we resolve these discrepancies?

4. Our clients complain that when we dilute a sample (e.g. oil or solvent matrix) to obtain results that meet quality control requirements, that the data so obtained are “useless” because of the high reporting limit. How do we generate analytical data for compliance decisions when dilutions must be performed?

Expecting a thorough reply.

Faxback # 11550