

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

November 8, 1990

Art Coleman  
Technical Assistance Section  
Division of Solid and Hazardous Waste Management  
Ohio EPA  
P.O. Box 1049  
1800 WaterMark Dr.  
Columbus, OH 43266-0149

Dear Mr. Coleman:

I am writing in response to your letter of October 30, 1990 concerning the questions you raised with Method 1311 (TCLP).

In answer to your first question, there are situations when a laboratory is asked to perform an inappropriate test. The TCLP was not intended to be applied to certain matrices, such as oils or neat solvents. In these instances, the waste usually goes through the filter and is, by definition, a liquid and its own extract. The analysis of this liquid extract for organics entails diluting it before injecting it into a GC or GC/MS. The dilution often results in detection limits being much higher than the regulatory thresholds. If this is the case, you **must assume your waste is hazardous** since the laboratory cannot demonstrate non-hazardousness with TCLP for these materials. We currently do not have the technology to address this issue.

In answer to your second question, a laboratory **must** use the TCLP if testing for hazardousness under the Toxicity Characteristic or if assessing effectiveness of waste treatment under the Land Disposal Restrictions Program. These two regulations actually contain the method as an appendix and it is, therefore, part of the law. However, the extract obtained from the TCLP may be analyzed by **any** method as long as that method has documented QC and the method is sensitive enough to meet the regulatory limit. In other words, the lab does not have to use SW-846 methods because these methods are intended to serve only as a guidance for the regulated community. SW-846 methods that are currently in draft form (e.g., 8250 for chlordane) may also be used to analyze the extract.

In answer to your third question, there are no plans to prepare a clarifying FR update in the near future.

I hope these answers have sufficiently addressed your concerns. If you have any further questions, please give me a call at (202) 475-6722 or write me again at the above address.

Sincerely yours,

Gail Hansen  
Health Scientist  
Methods Section  
(OS-331)

FaxBack # 11568