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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 29 1991

Mr. Michael Miller
Laboratory Manager
Betz Analytical Services
P.O. Box 4300
9669 Grogans Mill Rd.
The Woodlands, TX 77380

Dear Mr. Miller:

I am writing in reference to your letter of October 8, 1991, to Alec McBride, concerning the handling of TCLP extractions as they apply to liquid wastes, including oils and solvent-based products.

It is important to keep in mind that EPA does not require testing to determine whether a waste is hazardous; the generator may use other information (such as knowledge of the process by which the waste was generated) in making that determination. Also, certain oily material destined for recycling, is exempt (under Section 261.6(a)) from hazardous waste management requirements.

Liquid hazardous wastes are subject to hazardous waste management requirements regardless of whether they are destined for landfill disposal. As a result, there are many reasons why a generator or transporter would and should want to test the waste that they manage. For example, a generator may need to determine what types of storage, handling or transport requirements are applicable to the waste. The generator may also need to test the waste to determine compliance with the RCRA Land Disposal Restrictions program, under which wastes are subject to requirements for treatment by specified technologies prior to land disposal.

Given these considerations, if the generator still wishes to test his/her waste for the Toxicity Characteristic (TC) determination, then the TCLP must be followed. Once the fluid to be analyzed has been obtained (from either the initial filtration

step or the leaching procedure), the laboratory may use any appropriate determinative step for the analysis. If the methods currently in SW-846 do not achieve the required detection limits, then other methods should be used. This has often been necessary with volatile organics for oily matrices. At this time, the Agency is conducting studies of an automated headspace analysis methodology coupled with isotope dilution mass spectrometry in order to achieve greater analytical sensitivity for all TC volatile analytes. We suggest the use of this approach be considered. Currently, only a working draft method (copy enclosed) is available. Pending the outcome of Agency studies, the draft method will be revised and proposed for inclusion in SW-846.

For further assistance, please call the MICE (Methods Information Communications Exchange) at (703) 821-4789. Calls are recorded on an answering machine and, for the majority of questions, responses are provided within 24 hours. I hope this information has sufficiently addressed your questions.

Sincerely yours,

Original Document signed

Gail Hansen
Chief,
Methods Section (OS-331)

cc: David Bussard
Alec McBride
Dave Topping
Carrie Wehling, OGC
RCRA/Superfund Hotline
MICE Line