PPC 9442.1991(08)

TCLP EXTRACTIONS AS THEY APPLY TO OILY WASTE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 13 1991

Ms. Elaine McPherson
Technical Sales Representative
IT Corporation
17605 Fabrica Way
Cerritos, CA 90701

Dear Ms. McPherson:

I am writing in reference to your letter of April 11, 1991 concerning the handling of TCLP extractions as they apply to oily wastes.

We do not recommend performing the extract on the oily waste that passes through the filter as Margo Jackisch of SAIC suggested to you. First of all, the TCLP determines release potential in two steps, the first of which I will discuss here as it specifically applies to your situation. The initial filtration step separates the solid phase of a waste from its liquid phase. This liquid phase represents the primary waste leachate or the liquid fraction of a waste that is mobile and can be released from a landfill. In your case, the oil goes through the filter and, by definition, becomes its own leachate which is then analyzed directly.

If your waste is a used oil that is destined for recycling, there is no need to characterize the waste since it would be exempt under 40 CFR Section 261.6(a)(2)(iii) and (a)(3)(iii). It is the decision to dispose of the waste, in lieu of recycling, that triggers the waste characterization requirement. If your waste is a used oil that cannot be recycled and is destined for disposal, generators are required to make a hazard determination. If the generator chooses to test for the Toxicity Characteristic, the generator must use the TCLP or an approved alternative method, as described in 40 CFR 261.24. The extract obtained from the TCLP may be analyzed by any method, provided the method used has documented QC and is sensitive enough to meet the regulatory threshold for the constituents of concern.

In cases where the TCLP results on used oil or oily wastes

are inconclusive, including cases where the detection limit for a constituent is higher than the regulatory threshold, generators may use their knowledge of the processes involved in the generation of the waste to make a hazard determination or resort to an alternative analytical method to get an answer. This has been necessary with volatile organics. 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, including vinyl chloride. We suggest the use of this approach where needed. 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,

Gail Hansen
Environmental Health Scientist
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cc: David Bussard
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RCRA/Superfund Hotline
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