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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

CLARIFICATION ON WHETHER OR NOT A LABORATORY MUST USE THE
"SW-846 'A' ORGANIC METHODS"

October 12, 1994

Ms. Stephanie C. Akers
Quality Assurance Assistant
Analytical Technologies, Inc.
11 East Olive Road
Pensacola, Florida 32514

Dear Ms. Akers:

I am writing in response to your letter of September 29, 1994, inquiring as to whether or not your laboratory must use the "SW-846 'A' organic methods which were recently promulgated". The Office of Solid Waste believes that the Federal Register Notice of August 31, 1993, which promulgated Update I (58 FR 46040), is very clear in stating that "Any reliable analytical method may be used" to meet the requirements of RCRA 40 CFR parts 260 through 270 which do not require the use of a specific method for a particular application, or the use of appropriate SW-846 methods in general. In addition, the Disclaimer and Sections 2.1.1 and 2.1.2 of Chapter Two of SW-8-46 allow for flexibility in using methods already included in SW-846.

However, as a chemist, I do not understand why your laboratory would not wish to use the most current methods available. If you have any additional questions, please call me at 202-260-4761.

Sincerely,
Barry Lesnik, Chemist
OSW-Methods Section (5304)
RCRA Organic Methods Program Manager

RO 13707

Attachment

Analytical Technologies, Inc.
11 East Olive Road
Pensacola, Florida 32514
(904) 474-1001

September 29, 1994

Mr. Barry Lesnik, Chemist
Methods Section (OS-331) RCRA Organic Methods Program Manager
USEPA
Washington, DC 20460

Dear Mr. Lesnik:

I have a question regarding the SW-846 "A" organic methods which were recently promulgated. Do we, as a laboratory, have a choice as to whether or not we use the new methods, or may we continue to use the original methods?

Please respond in writing so-I may have documentation of your reply.

Thank you for your time.

Sincerely,
Stephanie C. Akers
Quality Assurance Assistant

cc: K. S. Hered - QA Manager
O. Taffe - QA Assistant

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