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RESPONSE TO REQUEST FOR A VARIANCE TO USE PALLADIUM FOR
GRAPHITE FURNACE ANALYSIS IN SEVERAL SW-846 METALS METHODS

United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

March 10, 1994

Chris Miller
National Technical Director of Inorganics
GTEL Environmental Labs, Inc.
Meadowbrook Industrial Park
Milford, New Hampshire 03055

Dear Mr. Miller:

I am writing in response to your letter of February 23, 1994 to Alec McBride concerning your request for a variance to use palladium for graphite furnace analysis in several SW-846 metals methods.

Monitoring requirements under RCRA Subtitle C specify only that the analyst must demonstrate that he can determine the analytes of concern in the matrix of concern at the regulatory level of concern. Since SW-846 methods are written as guidance for a wide variety of matrices, it is up to the individual analyst to optimize a particular method to his specific needs. Allowable modifications include adjustment of sample size or injection volumes, dilution or concentration of the sample, and modification or replacement of equipment. These method changes must be documented and the analyst must demonstrate that his method can meet the previously-stated analytical requirements. Specifically, Chapter Two of SW-846, Section 2.1.2, states that reagents "specified in these methods may be replaced by any similar types as long as this substitution does not affect the overall quality of the analyses".

If you have any further questions concerning inorganic methods, please call Ollie Fordham of my staff at (202) 260-4778.

Sincerely,
Gail Hansen, Chief,
Methods Section (5304)

cc: Alec McBride, Ollie Fordham