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LEADED PAINT SANDBLASTING WASTE TESTING USING TCLP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1-8-91

Bruce L. Johnson, Chief  
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Transportation Building  
St. Paul, MN 55155

Dear Mr. Johnson:

On December 6, 1990, you sent a letter to our office requesting clarification on information you had heard regarding the applicability of the new Toxicity Characteristic Leaching Procedure (TCLP) relative to the old Extraction Procedure (EP) when testing leaded paint sandblasting waste. This letter responds to your specific concerns.

As you know, the Toxicity Characteristics (TC) rule was effective on September 25, 1990 for large quantity generators, and compliance must be achieved by March 29, 1991 for small quantity generators. On the compliance dates of the rule, the EP test can no longer be used for hazardous waste identification purposes; the new TCLP method must be used.

The likely source of confusion is the Land Disposal Restrictions (LDR) program, which allows use of either the TCLP or the EP test when measuring compliance with the treatment standards for certain arsenic- and lead-containing hazardous waste (see 55 FR 22660, June 1, 1990; Land Disposal Restrictions for Third Third Scheduled Wastes: Final rule; technical amendment - enclosed). For these wastes, the Agency specified that if a waste does not achieve the nonwastewater treatment standard based on analysis of a TCLP extract, but does achieve the standard based on analysis of an EP extract, the waste is in compliance with the treatment standard. (This action was taken because the data used to develop the treatment standards for these wastes were based on EP toxicity leachate data. Treatment standards for

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characteristic wastes for the remaining EP toxic metals (DO05, D006, D007, D009, D010, D011) and EP toxic pesticides (DO12 - D017) must be evaluated using the TCLP.) This LDR provision is applicable to treatment, storage, and disposal of hazardous waste which must meet required treatment standards prior to land disposal.

In summary, the information you received at the Mississippi Valley Conference regarding the use of the EP test versus the TCLP with respect to leaded paint sandblasting waste was, as you have also determined, inaccurate. The only circumstance that exists where there is an option of using either the TCLP or the EP is when measuring compliance with the treatment standards for certain arsenic- and lead-containing hazardous waste.

As for the information you received from Mr. Jack Kollmer at the November 9, 1990 luncheon, regarding the acceptance of the EP Toxicity test for "one time operations" which includes bridge paint removal, this was also inaccurate.

Of course, state and local agencies may have additional regulations that differ. The appropriate EPA Regional office or State and local regulatory agencies should be contacted for additional assistance or clarification.

If you have further questions regarding the TC-rule, please contact Steve Cochran at (202) 475-8551.

Sincerely yours,

David Bussard, Director  
Characterization and Assessment Division