

9445.1993(02)

CLARIFICATION OF METHOD 8260 CALIBRATION STANDARDS AND "WASTE TYPE"

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

March 11, 1993

Dr. Jerome King  
Quality Assurance/Quality Control Director  
A & L Midwest Laboratories, Inc.  
13611 B Street  
Omaha, Nebraska 68144

Dear Dr. King:

I am writing in response to your inquiry of January 28, 1993, concerning Method 8260 calibration standards and "waste type". Regarding calibration of Method 8260, the calibration criteria were established for 5-mL samples, since virtually all volatile organic analyses performed under the RCRA Program can be done on 5-mL samples. Since RCRA analyses are not typically performed on 25-mL samples, OSW has not done any extensive investigation of appropriate RFs for 25-mL samples.

There is an ongoing EPA effort to generate an integrated VOA method that would satisfy the analytical and regulatory requirements of the various Agency Program Offices where this issue is currently being addressed. Until this integrated method is completed, I would suggest that if you need to run 25-mL samples, you use either the Drinking Water criteria specified in Method 524.2 or the CLP criteria specified in the Low-Level Volatiles method in the current CLP Statement of Work.

Regarding your inquiry about data reporting, that is an issue that should be addressed to either your State regulatory agency or EPA Region 7.

Regarding the QA/QC associated with SW-846 Method 1311 (TCLP), "waste type" refers to materials which have significant differences in chemical constituents or physical properties. Every time there

is a significant change in the chemistry or physical state of the waste, a matrix spike must be performed in order to prove that your analytical procedure is working properly on the material being tested. There are a myriad of potential chemical and physical interferences that can alter analytical results. The matrix spike is the simplest, most cost-effective means of monitoring these possible problems.

We would agree with you that a waste generated from latex paints is different from a waste generated from enamel paints. Additionally, a waste generated from a titanium based paint is different from a waste generated from a lead based paint. There is no way to simply divide "waste types" into solids, liquids, and sludges. For example, sludges generated by oil refineries, by chrome plating operations, and by wood preserving would have totally different chemistries and certainly must be analyzed as different "waste types". Spiking one of these sludges tells you absolutely nothing about the possible analytical problems with the others.

If you have any further questions about organic or characteristics methods, call either me or Ollie Fordham at 202-260-4761.

Sincerely,  
Barry Lesnik, Chemist  
Methods Section (OS-331)  
RCRA Organic Methods Program Manager

cc: Ollie Fordham