

APR 20 1989

Mr. Richard S. Leonard
Quality Control Coordinator
NET Pacific, Inc.
435 Tesconi Circle
Santa Rosa, CA 95401

Dear Mr. Leonard:

I am writing in response to your letter of February 9, 1989 requesting guidance on what analytes to look for when performing RCRA analyses.

One selects the list of target analytes based on the regulatory purposes for which the analysis is being performed. For example, if one is a land disposal facility which is required to monitor its ground water, then one analyzes the ground water for those analytes listed in Appendix IX of 40 CFR Part 264. On the other hand, if the reason for testing is to determine if the waste is a hazardous waste by reason of Extraction Procedure Toxicity, then one only needs to analyze the Method 1310 extract for the 8 metals and 6 organic compounds listed in 40 CFR Part 261.24. Generally, the analyses a facility must perform are described in its permit and, especially the Waste Analysis Plan.

I can understand how the various lists and analytes described in Test Methods for Evaluating Solid Waste (SW-846) can be confusing. SW-846 is a compilation of methods designed to cover all testing one might need to do to comply with RCRA data gathering needs. It contains testing methods for complying with all aspects of the RCRA regulations and a method may be indicated as being approved for determination of analytes which might not need to be determined in one's particular situation.

If you have any other questions on the RCRA regulations, I suggest that you contact the RCRA toll free hotline at 800-424-9346.

Sincerely yours,

David Friedman, Chief
Method Section (OS-331)

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