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LEACHING TESTS FOR EVALUATING SOILS CONTAMINATED WITH LEAD

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MEMORANDUM

SUBJECT: Appropriate leaching test to use in evaluating soils contaminated with lead.

DATE: October 30, 1987

FROM: David Friedman, Chief
Methods Section (WH-562B)

THRU: Alec McBride, Chief
Technical Assessment Branch (WH-562B)

TO: Thomas Spittler, Chief
Laboratory Branch, Region I

As you requested, I am writing to review the regulatory status of the various leaching test that have been developed for use in the hazardous waste program with respect to the problem of assessing the regulatory status of contaminated soils.

When evaluating a soil, or other waste, to determine whether it is a hazardous waste by reason of the toxicity characteristic one should use Method 1310, the Extraction Procedure. While, sometime in the future, we expect to replace Method 1310 with the new Toxicity Characteristic leaching Procedure (TCLP), the TCLP has not yet been promulgated for such use.

As I indicated at the recent meeting in Annapolis of the Regional laboratory chiefs, OSW has recently developed Method 1312 for use in evaluating the leaching potential of in-place soils and debris. This test, which is a modification of the TCLP, employs regional specific simulated acid precipitation as the extraction medium. As you recently noted in your work on neutral soils contaminated with lead, the high acetate concentration of the TCLP relative to the Ep means that the TCLP

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is significantly more aggressive than the EP for such materials. For this, and other reasons, OSW feels that use of the TCLP for determining the ground water contamination of soils and debris that are to remain in place is a misapplication of the procedure. In upcoming guidance manuals on both making clean

closure determinations, and on facility investigations, the Agency will approve Method 1312 for use as the leaching estimation tool for those situations. For your convenience, I have enclosed a draft copy of Method 1312.

I hope I have clarified the use of the different methods for you. I want to thank you for calling my attention to the problem you faced when the TCLP was applied to the contaminated soils in your area. I am sorry that I did not get a chance to see you in Annapolis last week.

cc: All Regional Laboratory Chiefs
All Regional ESD Directors
All Regional Solid Waste Branch Chiefs

Enclosure