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BIAS CORRECTION APPLIED TO THE TCLP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 8 1990

Mr. Michael Paessun  
Wadsworth/Alert Laboratories, Inc.  
4101 Shuffel Dr. N.W.  
North Canton, OH 44720

Re: Bias Correction on TCLP

Dear Mr. Paessun:

We are pleased to respond to your concerns regarding the application of bias correction for the TCLP. This response will supplement our initial responses to questions from your company (communication with Mr. Marvin Stephens) and hopefully will cover all of your concerns.

The issue of bias correction was covered in the TC final rule of March 29, 1990 (55 FR 11875). A restatement of the requirement to correct for bias and a description of the method for bias correction was issued in the June 29, 1990 correction notice (55 FR 26993), to clarify the intent as well as procedure.

We would also like to respond to your specific questions:

1. The TCLP method does indeed apply to both the Toxicity Characteristic program and the Land Disposal Restrictions program. Any time the TCLP is required, any and all requirements within the procedure must be met. It should be noted that the limits set in the Land Disposal Restrictions program were established based on data which was corrected for bias.
2. All TCLP analytical results are to be corrected for bias, including those which fall below the treatment standards. This is indeed the intent of spike recovery. In some cases the method (or laboratory/analyst) may underestimate the true concentration. It is for that reason

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that it is critically important that the spike recovery correction factor be applied when the results are less than the treatment standards.

3. Data collected before the mandatory date would not be subject to correction for analytical bias to comply with the toxicity characteristic ruling. However, it should be noted that the facility may be liable for proper disposal of any waste which was improperly identified. After September 25, any hazardous waste determinations should be based on the TCLP with bias correction.

4. If you wish to supply information on the impact of bias correction on generators of hazardous waste, I suggest you send this information to:

Steve Cochran  
Chief, Characteristics Section  
OS-331  
401 M Street  
Washington, DC 20460

I hope we have been responsive to your questions. If you need additional information on the Toxicity Characteristic Rule, please contact Steve Cochran at 382-4769 or contact Jeanne Hankins at 382-4761 for questions on bias correction.

Sincerely,

Sylvia K. Lowrance  
Director  
Office of Solid Waste