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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 21, 1996

George E. Dials, Manager
Carlsbad Area Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221

Dear Mr. Dials:

This letter provides written response to a request by DOE in our September 19, 1995 meeting to use Fourier Transform Infrared Spectroscopy (FTIRS) for headspace gas sampling analysis, and follows up verbal approval at the September meeting for DOE to use the FTIRS to characterize headspace samples. Additionally, this letter notifies you that the FTIRS method has been accepted as a SW-846 draft method.

It is our position that the Carlsbad Area Office (CAO) has adequately demonstrated that FTIRS is acceptable for the analysis of drum headspace VOCs. Our approval for use of FTIRS for the analysis of drum headspace VOCs is contingent upon the CAO incorporating the requirements in the draft FTIRS method and report (INEL-95/0332, September 19, 1995), as presented and discussed at our September meeting, into the "Transuranic Waste Characterization Quality Assurance Program Plan" (QAPP), DOE/CAO-94-1010, Revision 0. These requirements include the use of multivariant techniques [e.g., partial least squares (PLS)], use of blanks, field reference standards, demonstration of compliance with appropriate QAPP quality assurance objectives and participation in the CAO performance demonstration program as specified in the QAPP. The QAPP must be revised and implemented at the DOE generator/storage sites prior to using FTIRS for the analysis of drum headspace VOCs.

Mr. Barry Lesnik, EPA-OSW Organics Method Development Manager, has been working with Dr. Michael Connolly, Idaho National Engineering Laboratory FTIRS principal investigator, to

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get this method approved for incorporation into the EPA SW-846 methods manual. The draft FTIR method and INEL-95/0332 report have undergone extensive review by the OSW and has been approved as an EPA SW-846 draft method. This draft method has been assigned an EPA SW-846 method number of 8450, and will be included in the next proposed update to EPA SW-846. Copies of the draft EPA Method 8450 will be sent to the CAO when available.

If you have any questions or require additional information, please contact Chris Rhyne of my staff at (703) 308-8658.

Sincerely Yours,

Michael Shapiro, Director
Office of Solid Waste

cc: David Neleigh, Region 6
Barry Lesnik, EMRAD
Chris Rhyne