PPC 9442.1991(17)

ANALYTICAL METHODS FOR CONDUCTING TESTING UNDER THE TC RULE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Nathan Fishback
Assistant U.S. Attorney
Room 330
517 E. Wisconsin Avenue
Milwaukee, Wisconsin 53202

Dear Mr. Fishback:

This letter is to follow up on a discussion with Mr. Richard Ross of your office in which he requested a written clarification of the applicability of certain analytical methods for conducting testing under the toxicity characteristic regulation.

The Technical Assessment Branch in EPA's Office of Solid Waste is responsible for developing and promulgating analytical methods for EPA's hazardous waste program, including the Extraction Procedure (EP) leaching test. Until September 25, 1990, when changes to the toxicity characteristic (TC) became effective, the testing protocol for determining compliance with the TC was the EP test. The EP test was described in Appendix II to 40 CFR Part 261. See 40 CFR Part 261, Appendix II (Superceded test) (1990). Appendix II described the various steps of the leaching procedures itself and then stated that the test methods to be used for analyzing the 14 compounds were those specified in "Test Methods for the Evaluation of Solid Waste, Physical/ Chemical Methods", known as SW-846.

Until June 21, 1990, the methods specified in SW-846 for arsenic, selenium, and mercury were Atomic Absorption, Furnace Technique (methods 7060 and 7740 for arsenic and selenium, respectively); Atomic Absorption, Gaseous Hydride (methods 7061 and 7740 for arsenic and selenium, respectively); and Manual, Cold Vapor Technique (methods 7470 and 7471 for mercury). On June 21, 1990, the Agency also promulgated method 6010 (Inductively Coupled Plasma Atomic Emission Spectroscopy) for arsenic and selenium. The Agency has not promulgated an Atomic Absorption, Direct Aspiration Method for analyzing arsenic, selenium, or mercury.

If you have any questions on this information, please call me on FTS 260-4761.

Sincerely,

Alexander McBride, Chief
Technical Assessment Branch