

PPC 9445.1984(03)

ANALYTICAL METHODS FOR PETROLEUM REFINING RESIDUES AND
WASTES

25 MAY 1984

Clarification of Guidance on Petroleum
Refinery Waste Analyses

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Hazardous Waste Branch Chiefs
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On April 3, 1984, I forwarded to you a memo entitled "Guidance on Petroleum Refinery Waste Analyses for Land Treatment Permit Applications" (see copy attached). My April 3 memo provided guidance on evaluating petroleum refinery waste analyses submitted in land treatment permit applications. It included a list of hazardous constituents suspected to be present in petroleum refinery wastes and described the analytical methods for these wastes. This memo provides additional guidance clarifying the analytical methods that should be used for these wastes.

Attached is a copy of a draft document entitled, "Handbook for the Analysis of Petroleum Refinery Residues and Waste." This document describes the analytical plan that will be employed in OSW's petroleum refinery waste study. The analytical plan includes sample preparation techniques, inorganic and organic analytical methods, and analytical quality control procedures. Although developed for the OSW petroleum refinery waste study, the information provided in the attached document will be useful in any situation in which petroleum refinery waste analyses are necessary, including RCRA permitting.

The draft analytical method for organics provided in my April 3 memo was derived from an earlier draft of the attached document. This revised document now includes a more complete description of this method, and thus should be consulted by

permit writers and applicants as EPA's most recent guidance. Specifically, Section 3.2 of the document includes the analytical methods for organic parameters. The hazardous organic constituents identified in my April 3 memo should be evaluated in waste analyses for land treatment permit applications.

In using the attached document, two points should be noted. First, the Extraction Procedure (EP) toxicity test data, as described in Sections 3.1.1 and 3.1.2, need not be submitted in the land treatment permit application. Rather, total metal concentrations should be reported in the application. Second, certain of the analytical quality control procedures described in this document, including frequency of procedural blanks, duplicates, and instrumentation checks, may not be sufficient for RCRA permit waste analysis plans. The analytical QA/QC procedures described were developed for laboratories that are under close EPA supervision and are participating in the OSW performance audit program. Also QA/QC procedures for sampling are not addressed in the attached document. Comprehensive quality assurance/quality control procedures for waste sampling and analysis should be specified in the permit application. General guidance on QA/QC procedures can be found in Test Methods for Evaluating Solid Wastes (SW-846) and in Permit Applicants Guidance Manual for the General Facility Standards of 40 CFR 264 (SW-968)

If you have any questions on the analytical procedures described in the attached document please contact Ben Smith (FTS-382-4791) of the Waste Identification Branch. Any questions regarding the use of this guidance in permitting land treatment units should be directed to Mike Flynn (FTS-382-4489) of the Land Disposal Branch.

Attachments

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