PPC 9441.1992(05)

VALIDITY OF METHOD 3060, HEXAVALENT CHROMIUM DIGESTION

United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

March 6, 1992

Mr. Rock J. Vitale
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The Commons at Valley Forge
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Valley Forge, Pennsylvania 19481

Dear Mr. Vitale:

In response to your letter of March 2, 1992 regarding hexavalent chromium, method 3060 for hexavalent chromium digestion included in the 2nd Edition of SW-846 is still valid until the 3rd Edition of SW-846 is promulgated. The method does not work well on some matrix types, but if you have good quality assurance data on your analyses, you may be able to prove it works fine on your samples. It is being dropped from the 3rd Edition of SW-846 because errors have been found in the analyses of hexavalent chromium in certain sample matrices.

For your information, the hazardous waste regulations under RCRA require that specific testing methods described in SW-846 be employed for certain applications. The following sections of 40 CFR require the use of SW-846 methods:

1) Section 260.22(d) (1) (i) - Submission of data in support of petitions to exclude a waste produced at a particular facility.

2) Section 261.22(a) - Evaluation of wastes against the Corrosivity Characteristic.

3) Section 261.24(a) - Evaluation of wastes against the Toxicity Characteristic.

4) Sections 264.314(a) and 265.314(d) - Evaluation of wastes to determine if free liquid is a component of the waste.

5) Section 270.62(a) (2) (i) (C) - Analysis of wastes prior to conducting a trial burn in support of an application for a hazardous waste incineration permit.

For all other applications, including your situation, the use of SW-846 testing methods is not mandatory. Other methods may be used, such as those put out by the American Society for Testing and Materials (ASTM).

Sincerely,
Oliver M. Fordham, Jr.
Chemist
Methods Section (OS-331)

cc: Alec McBride
Gail Hansen