

9443.1981(01)

EXTRACTION PROCEDURE TOXICITY TEST

JUN 17 1981

Mr. M. J. Boris
American Steel Foundries
3761 Canal Street
East Chicago, IN 46312

Dear Mr. Boris:

I am writing in response to your letter of May 11, 1981 requesting a ruling on whether the American Foundrymen's Society (AFS) Standard Test Procedure in which the container is handshaken twice daily by inverting it 15 times is an acceptable agitation procedure to employ when conducting the Extraction Procedure toxicity test [40 CFR 261.24].

The AFS method is not acceptable since it does not meet the definition of acceptable agitation; "...an acceptable extractor is one which will impart sufficient agitation to the mixture to not only prevent stratification of the sample and extraction fluid but also insure that all sample surfaces are continuously brought into contact with well mixed extraction fluid." Specifically the AFS method is deficient in that during the 12 hours or more that the sample remains undisturbed, stratification is likely to take place.

The magnetic stirrer method you also asked about may however be used if, after application of the Structural Integrity Procedure, the waste material is a monolithic piece. By suspending the sample in a continuously stirred bath of extraction fluid, the objectives described in the aforementioned specification will be met.

I hope that this answers your question. If you have any additional questions, please feel free to give me a call at (202) 755-9187.

Sincerely,

Original Document signed

RO 12031

David Friedman
Manager, Waste Analysis Program
Hazardous and Industrial Waste Division (WH-565)