

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

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Notice of Intent to Reform Implementation of RCRA-related Monitoring and Notice of Availability for Preliminary Update IVA of SW-846 ("Test Methods for Evaluating Solid Physical Chemical Methods")

FROM: Elizabeth A. Cotsworth, Acting Director
Office of Solid Waste

TO: Senior RCRA Policy Advisors
Regions I-X

I have recently signed the Notice of Intent to Reform Implementation of RCRA-related Monitoring and Notice of Availability for Preliminary Update IVA of SW-846 ("Test Methods for Evaluating Solid Waste Physical/Chemical Methods"). The notice has been published and the citation is 63 FR 25430 (Vol 63, No 89, Friday, May 8, 1998). Title: Notice of intent to reform implementation of RCRA-related methods and monitoring and notice of availability for Draft Update IVA of SW-846. I have attached a copy of the Notice for your information and use.

In addition to announcing the availability of A Draft Update IVA@ to the Third Edition of SW-846. which contains new and revised methods, the Notice announces OS W's intent to reform implementation of RCRA-related monitoring by formally adopting a Performance Based Measurement System (PBMS). Part of the implementation of PBMS in the RCRA Program will include a proposal to change certain RCRA regulations so that the exclusive use of SW-846 methods will no longer be required. EPA asks for comments on this deregulatory change. In addition the Agency invites comment on the idea of deleting several individual methods and integrating them into two comprehensive methods, and removing Chapter Eleven from SW-846. After the implementation of PBMS in the RCRA Program and review of the comments on Update [VA. the EPA expects to finalize Update IVA as guidance.

The Notice revises several methods contained in the Third Edition of SW-846, as amended by Update III. The Notice also adds several new methods to SW-846. These revised and new methods comprise Update IVA. Some of the methods that the Agency is most excited about are:

Methods 3545A Pressurized Fluid Extraction (PFE) is a preparation technique for extracting water insoluble or slightly soluble organic compounds from soils, clays, and other waste solids. This method can achieve recoveries equivalent to those from Soxhlet extraction, using less solvent and taking significantly less time than the Soxhlet procedures.

Method 6200, Field portable X-Ray Fluorescence Spectrometry for the determination of elemental concentrations in soil and sediment is an asset for chemistry in the field and is applicable to the in situ and intrusive analysis of 26 inorganic analytes for soil and sediment samples.

Method 4500, Mercury in Soil by Immunoassay provide a screening procedure for the determination of mercury in soils at concentrations as low as 0.5 mg/kg, and is conducted in the field as well.

Methods 7473, Mercury in Solids and Solutions by thermal Decomposition, Amalgamation, and Atomic Absorption Spectrometry is a new method for the determination of mercury in both the laboratory and field environment. Total mercury in soils, sediments, bottom deposits, and sludge-type materials as well as in aqueous waste and ground waters can be determined. The total analysis time for most samples is less than five minute.

Method 9074, Turbidimetric Screening Method for Total Recoverable Petroleum Hydrocarbons in Soil, may be used as a good screening tool, for samples to determine the total amount of recoverable petroleum hydrocarbon contamination in soil, including a wide range of fuels, oils, and greases. With the addition of these methods to SW-846, these methods should greatly improve the range and versatility of monitoring emerging in the environment.

If you have any questions regarding this Notice, please contact Kim Kirkland at (703) 308-0490, or <kirkland.kim@epamail.epa.gov>.

Enclosure

cc: Regional RCRA Contacts
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