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METHODS 1310 AND 1330: EXTRACTION PROCEDURE AND EXTRACTION  
PROCEDURE FOR OILY WASTE

AUG 11 1987

Mr. Brian Monson  
State of North Dakota  
Dept. Of Health  
1200 Missouri Ave.  
P.O. Box 5520  
Bismark, ND 58502-5520

Dear Mr. Monson:

As you requested, during our recent telephone conversation, I am writing to review the regulatory status of Method 1310 (Extraction Procedure) and Method 1330 (Extraction Procedure for Oily Waste).

When testing a waste to determine if it exhibits the characteristic of Extraction Procedure Toxicity one employs Method 1310. This is so even if the waste would be considered to be an "Oily Waste". The Agency proposed the Extraction Procedure for Oily Waste on October 1, 1984 (49 Federal Register 38, 786) and to replace Method 1310 with the new Toxicity Characteristic Leaching Procedure, see January 14, 1986 (51 Federal Register 1602) and June 13, 1986 (51 Federal Register 21, 648). This change has not yet been promulgated. Method 1310 remains the designated acceptable procedure (see 40 CFR 261.24).

The Agency however has been concerned that Method 1310 might not adequately model the potential leachability of toxic species from certain listed oily wastes. Method 1330, therefore, was developed as a worst case estimation of potential toxicant release. For delisting petition evaluation purposes, it serves as a conservative indication of the mobile metal fraction. The mobile metal concentration (MMC) values are compared with delisting thresholds developed using a specially developed fate and transport model.

We agree that the formula for calculating MMC in the recently published 3rd edition of Test Methods for Evaluating solid Waste (SW-846) contains an error. The weight of crude solid (L2) should

-2-

be in grams not milligrams. This error will be corrected in the next update of the manual.

In summary, under the RCRA regulatory program, Method 1310 is the only method currently approved for use in identifying wastes that exhibit the characteristic of Extraction Procedure Toxicity. I apologize for any confusion this may have caused you and trust this clarifies the status of Methods 1310 and 1330.

Should you have any additional questions in regard to this matter, please contact me at (202) 382-4761.

Sincerely,

David Friedman, Chief  
Methods Section

cc: Suzanne Rudzinski  
Myles Morse  
Martin R Schock (ND)  
Ken Kary (ND)  
Larry Wapensky (Reg. VIII)