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CALCULATION OF TCLP CONCENTRATIONS FROM TOTAL CONCENTRATIONS

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

September 21, 1992

Mr. Joseph R. Storrs
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Newman, Illinois 61942-0379

I am writing in response to your letter of August 28, 1992 regarding the calculation of TCLP concentrations from total concentrations.

As we previously discussed, you may use total analysis in lieu of TCLP analysis to determine if an analyte could possibly be above the appropriate regulatory level. This is stated in Section 1.2 of Method 1311(TCLP) as you correctly pointed out. Your understanding of EPA's policy on this procedure as outlined in paragraph 3 of your letter is correct.

Equation (2) presented in your letter is not valid and is inconsistent with paragraph 3 of your letter. Samples are almost never completely dissolved in the extraction fluid during TCLP analysis. Generally only a small portion goes into solution as this is a leaching procedure and not a total dissolution procedure.

To summarize, in the case of a 100% solid sample where TCLP is required, you may perform a total analysis for the regulated analyte by an appropriate method, divide the total concentration found by twenty (20), and compare the result with the regulatory limit for that analyte identified in the appropriate regulation.

I hope that this information will be of use to your analytical program. If you have any questions, please feel free to call me at (202) 260-4778.

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

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