



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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JOHNSON

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

The Honorable Paul D. Coverdell
United States Senate
Atlanta Office
100 Colony Square, Suite 300
1175 Peachtree Street, N.E.
Atlanta, Georgia 30361

MAY 26 1998

Dear Senator Coverdell:

Thank you for your letter of April 29, 1998 to Administrator Browner. You forwarded correspondence from Mr. John M. Turk regarding "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), Method 5035 (Closed-System Purge-and-Trap and Extraction for Volatile Organics in Soil and Waste Samples). Mr. Turk was concerned about the use of Method 5035 for its use in evaluating volatile organics in soils.

For most situations, SW-846 functions as the Office of Solid Waste's (OSW) guidance document setting forth acceptable methods to be implemented by the user, as appropriate, for satisfying Resource Conservation and Recovery Act (RCRA)-related sampling and analysis requirements. The SW-846 methods are not mandatory, but are intended to promote accuracy, sensitivity, specificity, precision, and comparability of analyses and test results. Method 5035 was developed to improve the accuracy of measuring the volatile organic compounds that were being lost through sampling handling in the field and laboratory prior to testing. As such, EPA finds it to be a more accurate sampling and analytical protocol.

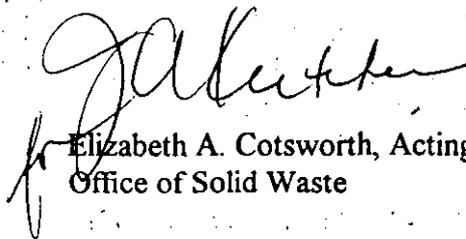
Those using method 5035 should be able to obtain more accurate measurements that delineate contamination and measure risks. If an inappropriate method is selected for measuring site characteristics, contamination could go undetected and result in unaddressed risks to human health and the environment. Therefore, by measuring the volatile organics present with a method such as Method 5035, one can more accurately measure the risk to human health and the environment. EPA or State risk-based standards are generally unaffected by the expected recoveries from an analytical method. As a result, it has been EPA's concern that in a number of cases volatile organic contaminate measurements below levels of concern may have resulted from volatile loss caused by poor handling, rather than low concentrations in the environment. EPA has long recognized this and has insisted that every effort be made to avoid the loss of volatile organic compounds from soil samples during handling. Method 5035 provides an important and updated tool that can be used to maintain sample integrity and accurately measure the risks of soil volatile organics.

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In addition, SW-846 is a document that changes over time as new information and data become available. Method 5035 is a good example of this continuing effort. Advances in analytical instrumentation and techniques are continually reviewed by OSW and are periodically incorporated into SW-846 as updates through a formal peer review and public comment process to support changes in the regulatory program and to improve method performance and cost effectiveness. Method 5035 went through this formal peer review and public comment process before being promulgated as part of Update III to SW-846 in June, 1997. Even though SW-846 is guidance and does not have regulatory effect, EPA allowed an extra six months for Update III to become effective so that those who would be directly impacted would have time to implement it. Finally, we are working closely with the laboratory community and will clarify some of the technical aspects of Method 5035 in the near term.

If you have additional questions or need further assistance, your staff may wish to contact Barry Lesnik of my staff at (703) 308-0476.

Sincerely,



Elizabeth A. Cotsworth, Acting Director
Office of Solid Waste