

JAN 27 1989

Ms. Karen Heyob
Environmental Engineer
O M Scott & Sons
Marysville, OH 43041

Dear Ms. Heyob:

This letter will clarify our telephone conversation, and your follow up letter, with respect to use of total concentration to demonstrate that a waste does not exhibit the characteristic of Extraction Procedure Toxicity.

The evaluation to be performed is as follows:

1. Determine the concentration of the analyte of concern in the waste expressed in g/100g (A).
2. Determine the waste's percent liquid (B).
3. Calculate the maximum theoretical extract concentration, in mg/L, (MTEC) using the formula.

$$\text{MTEC} = \frac{(A)}{[B + (20)(100-B)]}$$

4. If MTEC is below the Extraction Procedure Toxicity characteristic regulatory level, then the waste does not exhibit the characteristic. If MTEC is above the regulatory level, then one would have to run the test to show that the waste is non-hazardous.

Sincerely yours,

David Friedman
Chief, Methods Section

cc: Gary Daughtery
Manager, Environmental Engineering
O M Scott & Sons

Rebecca Strom
EPA, Region V