

PPC 9445.1987(02)

SW-846 METHODS MANUAL

SEP 16 1987

Dr. Suellen Pirages  
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Management Association  
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Washington, D.C. 20036

Dear Suellen:

I am writing in response to your recent letter requesting clarification of OSW's policy regarding the status of SW-846. It appears from your letter that a misunderstanding exists with regard to the function and regulatory status of the manual.

In general, EPA will mandate the quality assurance/quality control procedures in SW-846 but not the specific methods. To this end, we are in the process of preparing a Notice of Proposed Rulemaking which we expect to publish in the Federal Register early in 1988. However, for a limited group of regulations, we currently mandate use of SW-846 methods. For those regulations, SW-846 will continue to be mandatory. The specific program areas where SW-846 methods are mandatory include:

1. Determining whether a waste is hazardous by reason of one or more characteristics;
2. Sampling and analyzing a waste to gather data to support a delisting position;
3. Conducting an incinerator trial burn; and
4. Determining whether a bulk or containerized waste contains "free liquid."

Other than exceptions noted above, SW-846 serves as a compendium of methods which are approved, but not mandatory, for use in complying with the requirements of the RCRA regulations. This approach was adopted, by OSW, to offer the greatest degree of flexibility to the regulated community while minimizing the burden to them of having to evaluate methods for each and every RCRA monitoring requirement. The Agency continually reviews the effectiveness of this approach. If we find that the flexibility is resulting in compliance problems in specific program areas, we would consider expanding the areas where use of SW-846 methods are mandatory.

We agree with your comment that, when developing a testing program, one should consider not only the methods in SW-846 but also those published by organizations such as ASTM, AOAC, and Standard Methods. To that end, OSW has an active program to encourage and work with standard-setting organizations in developing testing methods that can be used in the RCRA program.

We would appreciate any assistance NSWMA can give us in developing and evaluating testing methods. Wherever possible, we would very much like to undertake joint programs with NSWMA. I would be happy to have David Friedman attend the next meeting of your Technical Committee to explore specific areas where NSWMA can assist us in developing and evaluating testing methods.

Sincerely yours,

Marcia Williams, Director  
Office of Solid Waste (WH-562)

cc: Sylvia Lowrance  
David Friedman