

CLARIFICATION NUMBER CAO-00-042, REV. 0
USE OF SW-846 METHODS
(SECTIONS B3-5, B3-6, B3-7 AND B3-8)

ISSUE

Can methods in SW-846 be used and modified, as appropriate?

CONCLUSION

There are several parts to this conclusion

- a. Methods required by the permit must be used.
- b. If a permit required method is also an SW-846 method, the flexibility in SW-846 can be used as appropriate, as long as the permit does not direct otherwise and as long as the modified method can be shown to meet QAOs.

DISCUSSION

The NMED has indicated in their response to comments on the draft permit that they have carefully reviewed and specified appropriate methods for sampling and analysis. In some cases, the NMED has limited some of the flexibility available in SW-846. In other cases, this flexibility is available.

For example, Chapter 2, Section 2.1 of SW-846 specifies that the methods have built in to them an "inherent flexibility" provided that "method performances appropriate for the intended RCRA application has been documented." This chapter states: "Glassware, reagents, supplies, equipment and settings other than those listed in this manual may be employed, provided that method performance appropriate for the intended RCRA application has been documented."