

5.2.1 Direct Measurement

EPA Method 25D is available on the World Wide Web @ <http://www.epa.gov/ttn/emc/promgate/m-25.pdf>

The VO concentration can be determined by testing the waste according to one of seven methods specified in the regulations or other methods validated according to Method 301. These seven methods include:

Analytical Method	Source
Method 25D	40 CFR 60, Appendix A
Method 624	40 CFR 136, Appendix A
Method 625	40 CFR 136, Appendix A*
Method 1624	40 CFR 136, Appendix A
Method 1625	40 CFR 136, Appendix A
Method 8260	SW-846**
Method 8270	SW-846**
Any other method which has been validated by "Alternative Validation Procedure for EPA Waste and Wastewater Methods, 40 CFR 63, Appendix D or Method 301 sections 6.1, and 6.3 with correction factors between 0.7 and 1.3.	

*Perform corrections to the compounds for which the analysis is being conducted based on the accuracy as recovery using the factors in Table 7 of the method.

**A formal QC program as required by the method must be maintained to ensure minimization of loss of compounds due to evaporation, degradation, reaction, or sorption and measurement of accuracy and precision of the procedures.

It is important to note that for each of these methods, there is a published list of chemical compounds which the EPA considers the method appropriate to measure (i.e., for the SW-846 Methods the list of appropriate chemical compounds are included in SW-846). The owner or operator of the facility, may only use these methods to measure compounds that are contained on the list associated with that method. The owner or operator must evaluate the mass of all VO compounds in a waste that have a Henry's law value greater than 0.1. If Method 25D is not used, one or more of the other methods should be used that are appropriate to ensure that the waste determination accounts for all organic compounds in the waste which have Henry's law constants of at least 0.1 (0.1 Y/X or

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1.8×10^{-6} atm/gram-mole/m³ at 25 C. A list of compounds with Henry's Law constants less than 0.1 Y/X can be found in 40 CFR 265, Appendix VI and in [Appendix A](#) of this document.