making. The Agency's evaluation of the extract data indicated that two grab samples of the petitioned waste contained leachable concentrations of lead at the compliance point above the health-based level of 0.015 mg/l used in delisting decision-making. These two grab samples were collected in January 1984 during a preliminary sampling effort. However, since this sampling event, BSC has provided analytical results quantifying leachable lead concentrations in 21 additional composite samples, including nine samples that were analyzed using the TCLP. Table 6 presents a summary of all the leachable lead data for BSC's petitioned waste.

TABLE 6.—SUMMARY OF LEACHABLE LEAD CONCENTRATIONS (MG/L) LANDFILL WASTE

Sampling date	Leachable lead concentration	Extraction method
January 1984 (grab samples)	0.426	EP
	0.08	EP
	0.97	EP
	0.474	EP
	0.052	EP
	0.045	EP
	1.61	EP
April 1984 (composite samples)	<0.01	EP
	<0.01	EP
	<0.01	EP
	<0.01	EP
	<0.01	EP
	0.04	EP
February 1985 (composite samples)	<0.01	EP
	0.013	EP
	<0.01	EP
	<0.01	EP
	<0.01	EP
	0.041	EP
September 1988 (composite samples)	0.05	TCLP
June 1992 (composite samples)	0.004	TCLP
	0.048	TCLP
	[1] 0.074	TCLP
	<0.003	TCLP
	0.003	TCLP
	0.004	TCLP
	[1] 0.021	TCLP
	0.110	TCLP

< Denotes that the constituent was not detected at the detection limit specified in the table.
[1] Concentration is average of duplicate samples.

For a number of reasons, the Agency believes that BSC's June 1992 sampling and analysis program provides a compelling demonstration that the higher leachable lead concentrations observed in the January 1984 sampling event do not truly represent the leachable lead concentrations in the petitioned waste. First, BSC used a different protocol to sample the petitioned waste in January 1984. Samples collected during January 1984 were simply partial core samples taken from sections of the landfill; whereas, samples collected during the later sampling events, particularly the June 1992 event, were collected and composited according to guidance typically given to petitioners. In the early stages of its review of BSC's petition, EPA raised questions concerning the differences between leachable lead data from samples collected in January 1984 and samples collected in April 1984. BSC conducted its February 1985 sampling program in response to the Agency's request to collect additional, full-core composite samples of the central portion of the landfill in order to provide more information about leachable lead concentrations in the petitioned waste. Leachable lead data from BSC's February 1985 composite sampling program, and subsequent composite sampling programs in September 1988 and June 1992, expanded the data set to a total of 28 data values, 21 of which correspond to composite samples. As shown in Table 6, the maximum leachable lead concentration for the subset of preliminary grab samples (1.61 mg/l) is significantly greater than the maximum leachable lead concentration for the subset of composite samples (0.11 mg/l). The Agency notes that even the *average* leachable lead concentration of the subset of preliminary grab samples (calculated to be 0.52 mg/l) is significantly greater than the maximum leachable lead concentration of the subset of composite samples (*i.e.*, 0.11 mg/l). Therefore, the Agency believes the preliminary grab samples may not be truly representative of the leachable lead concentrations in the petitioned waste.

Second, samples of BSC's petitioned waste collected in the two later sampling events (September 1988 and June 1992) were subjected to the TCLP, rather than the EP. As of September 25, 1990 the Agency adopted the TCLP as a replacement for and improvement upon the EP in its hazardous waste regulatory program. Thus, the Agency now requires that petitioners provide TCLP data rather than EP data in support of their petitions. The Agency believes that the maximum leachable lead concentration for the subset of samples analyzed using the TCLP (reported to be 0.11 mg/l) will be more representative of the potential mobility of lead from BSC's petitioned waste than the earlier EP results. When the maximum TCLP level for lead (0.11 mg/l) is input to the EPACML, this yields a compliance point concentration (0.0022 mg/l) well below the level of concern (0.015 mg/l). Therefore, the TCLP data clearly indicates that