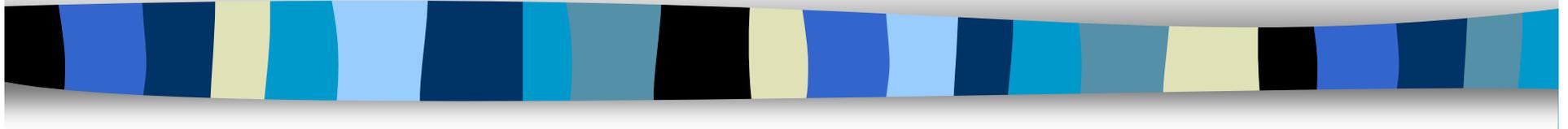
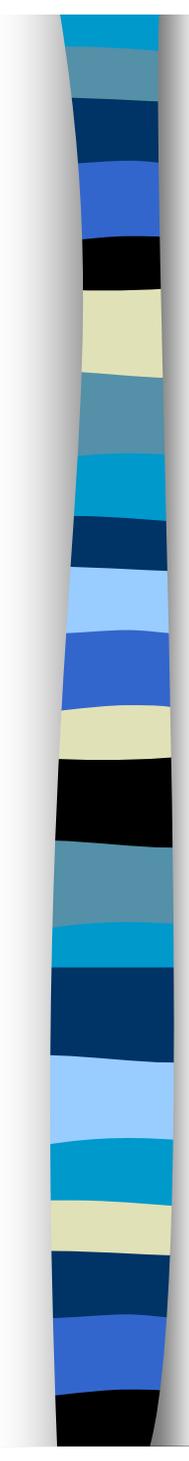


Joint Statement of Interest Industrial Members



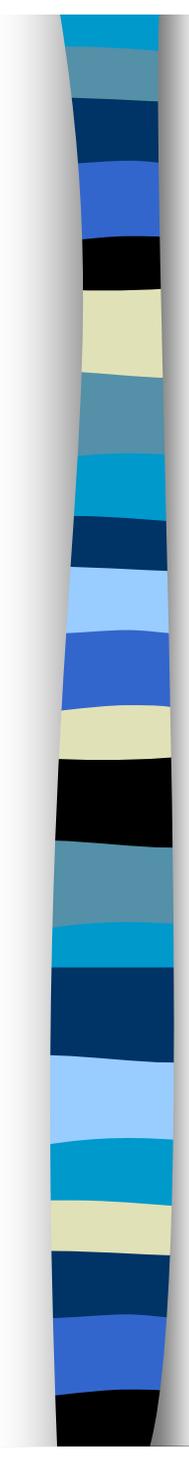
Federal Advisory Committee on
Detection and Quantification

June 21, 2005



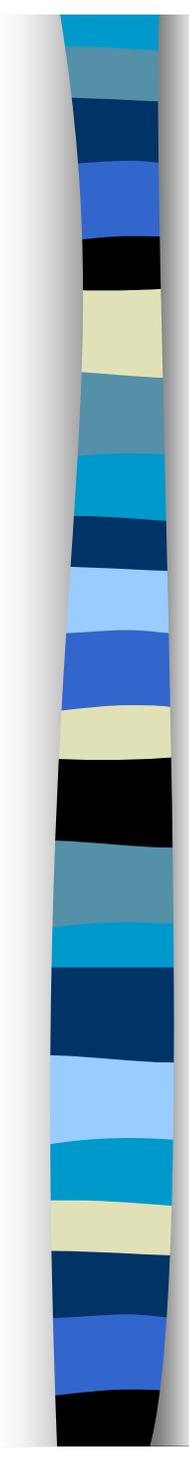
Primary Impacts

- NPDES Permits
- Stormwater monitoring
- Wastewater monitoring
- Drinking Water monitoring
- Ambient water quality monitoring
- Effluent Guideline development



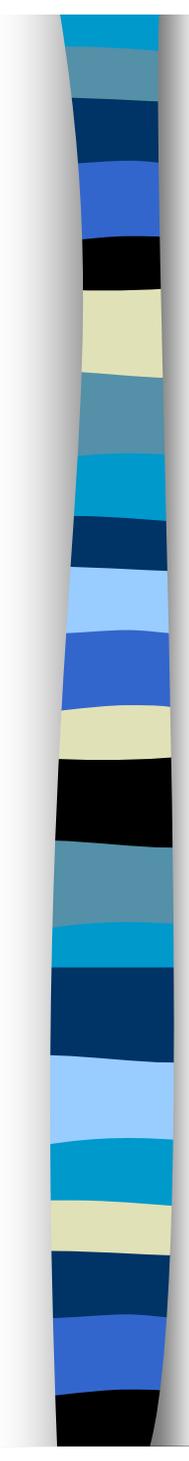
How are the results used:

- NPDES compliance testing
 - 40 CFR Part 136
 - Alternate testing programs approved by EPA
- NPDES permit applications
- Agency Enforcement
- Determine water impairments



Issues or Concerns

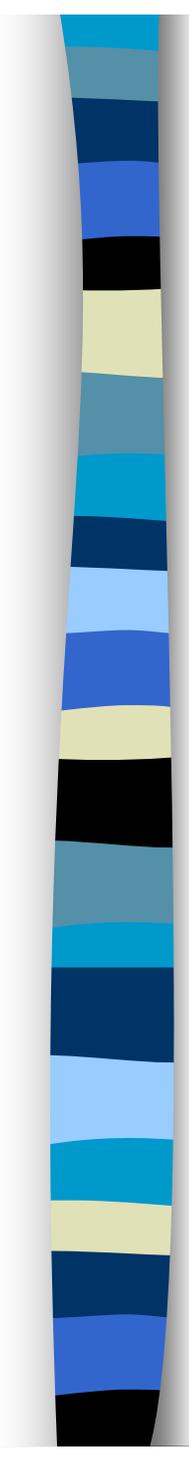
- Current MDL and ML:
 - dependent on spike levels
 - limited data sets
 - not based on inter-laboratory data
 - Unsound statistical procedure



Issues or Concerns (continued)

■ Permit Limits

- WQBEL should be set based on reliable sampling results
- Consistent data quality between labs for decision making
- Limits could be set causing compliance uncertainty



Issues or Concerns (continued)

- The current procedures for addressing matrix effects do not serve stakeholders