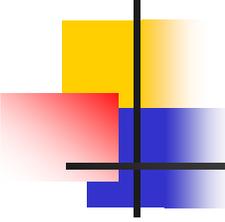


Federal Advisory Committee on Detection and Quantitation Approaches for Clean Water Act Programs

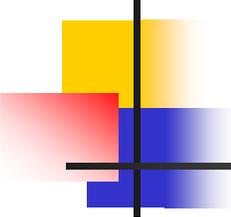
Exercise: Developing a Common Base
of Information

Interest: Publicly Owned Treatment
Works (POTWs)



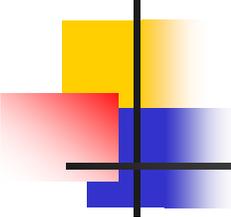
Q. What are your primary responsibilities that are related to or impacted by analytical test methods?

- Protecting the environment, human health, plant and service area operations, and plant personnel
- Providing true and accurate data
- Characterization/troubleshooting plant performance
- Collecting revenue based on wastewater quality received
- Planning/designing/constructing wastewater plants and service lines



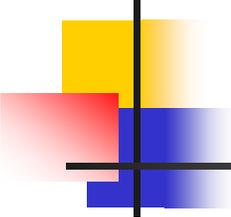
Q. How do you use the results of these methods in carrying out your responsibilities?

- Regulatory Reporting
- Permit Applications and Limit Derivation
- TMDL basis and research
- TRES/TIEs
- Regulate Industrial Discharges
- Biosolids Management
- Special Studies
- Define Quality Charge Testing Programs
- Develop Local Limits
- Influent/Effluent information for plant upgrades



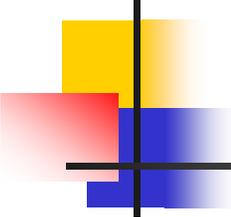
Q. What issues or concerns do you have about the current procedures to establish detection and quantitation limits?

- We don't have a promulgated procedure for defining detection and quantitation limits for methods
- The current procedures are not scientifically sound within the context of their use



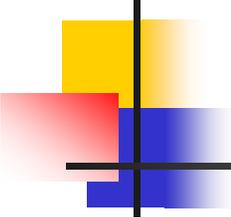
Q. What issues or concerns do you have about the current procedures to establish detection and quantitation limits? (Cont.)

- The procedures do not incorporate and apply Data Quality Objectives for bias, precision, representativeness, and comparability for lab and method performance at the detection and quantitation limits used in CWA programs, at all levels and frequencies of operations that can influence data use and interpretation relative to detection and quantitation limits.



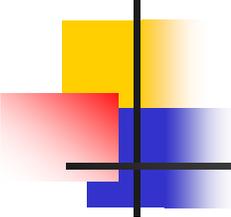
Q. What issues or concerns do you have about the current procedures to establish detection and quantitation limits? (cont.)

- EPA does not use the uncertainty of data, defined by detection and quantitation limits and their DQOs, to determine how data is used and reported in CWA programs, and whether it should be used in these programs.



Q. What issues or concerns do you have about the current procedures to establish detection and quantitation limits? (cont.)

- EPA does not qualify analytical method performance relative to DQOs defined for CWA programs and does not have promulgated procedures to determine whether methods are appropriate for these programs.
- The procedures do not allow labs to qualify analytical results relative to analytical interferences.



POTW Common Base

- Bottom Line: Our top priority is compliance with the Clean Water Act
 - In terms of detection and quantitation, what is the lowest concentration that can be measured using methods approved in 40 CFR 136 that can determine if a discharge is in compliance with the CWA?
 - For reasons of enforcement, equity, accreditation, and practicality, this lowest reportable concentration should be the same for all dischargers and receiving bodies.