

Statement of Interest

Federal Advisory Committee on Method of Detection and Quantitation Approaches and Uses in Clean Water Act (CWA) Programs (FACDQ)

Prepared by:

Zonetta E. English, MBA
Laboratory Manager
Louisville and Jefferson County Metropolitan Sewer District

Background: I manage the laboratory services for a Publicly Owned Treatment Works. I have 20 years of professional laboratory experience in both the private and public sector. Also, I currently serve on the Environmental Laboratory Advisory Board and served as chairperson for four years.

I am interested in developing procedures for detection and quantitation procedures that:

Encompass all analytical methods (reference by number) where applicable and clearly delineate those methods that are not appropriate.

Are scientifically based, not solely developed on statistical theory.

Allow the laboratory to meet the method of detection and quantitation criteria in real world applications- i.e. matrices: wastewater, air, biosolids, etc..

Laboratories can understand and fully implement based on their analytical capabilities.

Can be incorporated in the development of Data Quality Objectives for any program within the Clean Water Act.

The Data User (State, Local, Laboratory Professionals, and Environmental Interest Groups) can understand in order for the procedures to be utilized properly in wastewater permits, risk assessments, wet weather compliance, etc...

Provide guidelines for the use of data that falls below quantitation limits.

Will be agreed upon across all EPA Program and Enforcement Offices.

**Presented: Meeting #1 June 21-22, 2005
Washington, DC**

Statement of Interest
Federal Advisory Committee on Detection and Quantitation

James J. Pletl, Ph.D.
Environmental Scientist
Hampton Roads Sanitation District
Virginia Beach, VA

The Hampton Roads Sanitation District (HRSD) was formed in 1940 and currently serves the wastewater treatment needs of approximately 1.6 million customers in the Tidewater region of Virginia with 13 separately permitted facilities. The NPDES permits for these facilities require the use of specific EPA and Virginia-approved analytical methods to generate data. This data is primarily used to determine the need for permit limits and demonstrate compliance with pre-existing permit limits. The quality and the reliability of this data, therefore, are critical to HRSD. Data quality and reliability is assessed, in part, by qualifying data relative to the detection and quantitation limits of the analytical methods used in complying with permit requirements.

Hence, HRSD is interested in detection and quantitation procedures that:

1. define both lab and analytical method performance, however the procedures for each may differ in scope.
2. are scientifically sound within the context of their use.
3. incorporate and apply DQOs 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 operation that can influence data use and interpretation relative to detection and quantitation limits (intra-lab, inter-instrument, inter-analyst, inter-lab, etc.).
4. 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.
5. can be used to qualify analytical method performance relative to DQOs defined for CWA programs and whether methods are appropriate for these programs and their uses.
6. are not so complex that they preclude fully qualified labs from using them.
7. allow labs to qualify analytical results relative to analytical interferences.
8. apply to all analytical methods where detection and quantitation concepts are appropriate

Statement of Interest

Chris Hornback

Director, Regulatory Affairs

National Association of Clean Water Agencies (formerly the Association of Metropolitan Sewerage Agencies)

Meeting of the Federal Advisory Committee on Detection and Quantitation

June 21 and 22, 2005

Alexandria, Virginia

The National Association of Clean Water Agencies (NACWA) represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide. Our members treat and reclaim a majority of the wastewater generated in the United States each day. As permittees under the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) permitting program, our members have a vital interest in the issue of analytical method detection and quantitation. Wastewater treatment agencies use EPA-approved test methods or employ laboratories who use those methods to monitor their effluent and determine compliance with their permit limits. The approaches used to determine an analytical method's detection and quantitation levels can have a direct impact on a permittee's compliance status.

As Director of Regulatory Affairs for NACWA, my interests in this FACA process mirror the interests of the NACWA membership. First, we hope that this process will lead to a set of consensus recommendations that EPA will accept and implement. As to the substance of those recommendations, we are interested in establishing procedures for the development of detection and quantitation limits that are scientifically sound, can be easily understood and applied consistently across the country, and produce levels that labs can meet from day-to-day and analyst-to-analyst basis. Finally, we are interested in clearly defining when and how data are used in various Clean Water Act programs based on detection and quantitation limits.