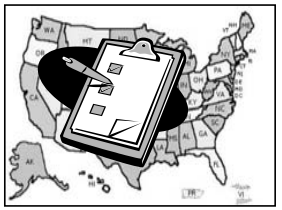
STATE OF COLORADO
Department of Public Health and Environment

State Group

State Survey for D/Q Use

David Akers, Colorado DPHE
Timothy Fitzpatrick, Florida DEP
Robert Avery, Michigan DEQ
Thomas Mugan, Wisconsin DNR

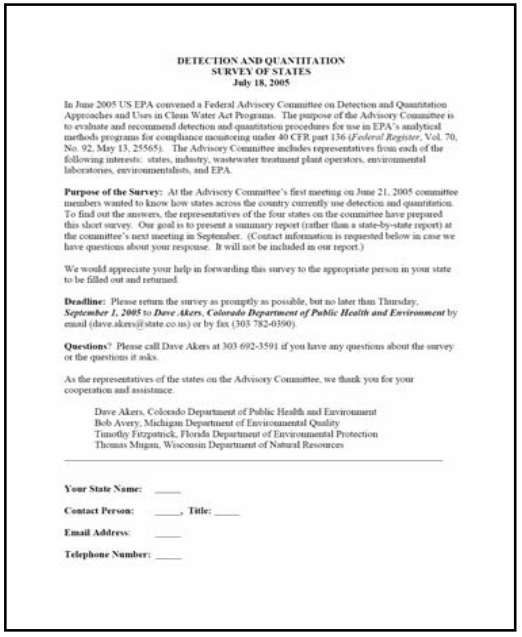
Interim Report: States Survey



FACDQ
September 29-30, 2005
Arlington, VA

Survey

- Following June FAC Meeting State Reps.:
  - Worked as caucus
  - Developed survey



DETECTION AND QUANTITATION
SURVEY OF STATES
July 18, 2005

In June 2005 US EPA convened a Federal Advisory Committee on Detection and Quantitation Approaches and Uses in Clean Water Act Programs. The purpose of the Advisory Committee is to evaluate and recommend detection and quantitation procedures for use in EPA's analytical methods programs for compliance monitoring under 40 CFR part 136 (*Federal Register*, Vol. 70, No. 92, May 13, 25565). The Advisory Committee includes representatives from each of the following interests: states, industry, wastewater treatment plant operators, environmental laboratories, environmentalists, and EPA.

Purpose of the Survey: At the Advisory Committee's first meeting on June 21, 2005 committee members wanted to know how states across the country currently use detection and quantitation. To find out the answers, the representatives of the four states on the committee have prepared this short survey. Our goal is to present a summary report (rather than a state-by-state report) at the committee's next meeting in September. (Contact information is requested below in case we have questions about your response. It will not be included in our report.)

We would appreciate your help in forwarding this survey to the appropriate person in your state to be filled out and returned.

Deadline: Please return the survey as promptly as possible, but no later than Thursday, ***September 1, 2005*** to ***Dave Akers, Colorado Department of Public Health and Environment*** by email (dave.akers@state.co.us) or by fax (303 782-0390).

Questions? Please call Dave Akers at 303 692-3591 if you have any questions about the survey or the questions it asks.

As the representatives of the states on the Advisory Committee, we thank you for your cooperation and assistance.

Dave Akers, Colorado Department of Public Health and Environment
Bob Avery, Michigan Department of Environmental Quality
Timothy Fitzpatrick, Florida Department of Environmental Protection
Thomas Mugan, Wisconsin Department of Natural Resources

Your State Name: ____

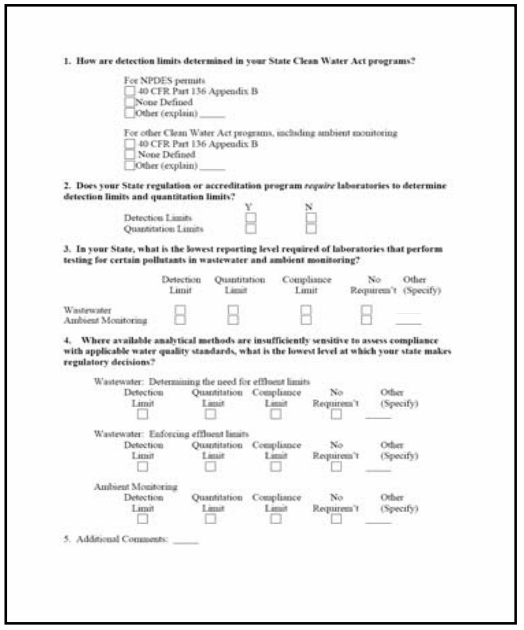
Contact Person: ____, **Title:** ____

Email Address: ____

Telephone Number: ____

Survey

- Four Questions
  - Check boxes
  - Easy to respond
  - Space for comments
- ASWIPCA sent to states
- 31 Responses so far – presented in this interim report



1. How are detection limits determined in your State Clean Water Act programs?

For NPDES permits
☐ 40 CFR Part 136 Appendix B
☐ None Defined
☐ Other (explain) ____

For other Clean Water Act programs, including ambient monitoring
☐ 40 CFR Part 136 Appendix B
☐ None Defined
☐ Other (explain) ____

2. Does your State regulation or accreditation program *require* laboratories to determine detection limits and quantitation limits?

	Y	N
Detection Limits	☐	☐
Quantitation Limits	☐	☐

3. In your State, what is the lowest reporting level required of laboratories that perform testing for certain pollutants in wastewater and ambient monitoring?

	Detection Limit	Quantitation Limit	Compliance Limit	No Requirem't	Other (Specify)
Wastewater	☐	☐	☐	☐	____
Ambient Monitoring					

4. Where available analytical methods are insufficiently sensitive to assess compliance with applicable water quality standards, what is the lowest level at which your state makes regulatory decisions?

Wastewater: Determining the need for effluent limits

Detection Limit	Quantitation Limit	Compliance Limit	No Requirem't	Other (Specify)
☐	☐	☐	☐	____

Wastewater: Enforcing effluent limits

Detection Limit	Quantitation Limit	Compliance Limit	No Requirem't	Other (Specify)
☐	☐	☐	☐	____

Ambient Monitoring

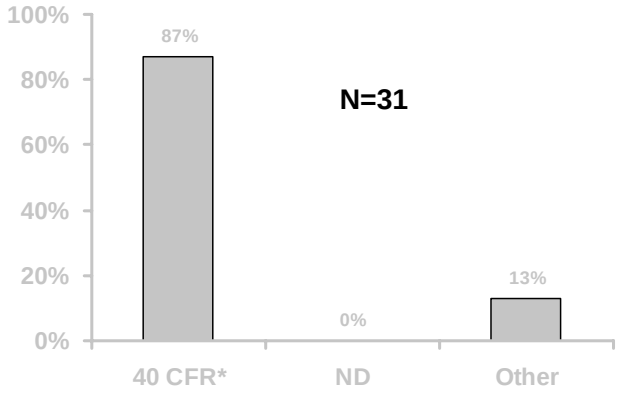
Detection Limit	Quantitation Limit	Compliance Limit	No Requirem't	Other (Specify)
☐	☐	☐	☐	____

5. Additional Comments: ____

These are the acronyms you'll see in the tables that follow, with their meanings	
40 CFR	40 CFR Part 136 Appendix B
ND	None Defined
DL	Detection Limit
QL	Quantitation Limit
CL	Compliance Limit
NR	No Requirement

Question 1: How are detection limits determined in your State Clean Water Act Programs?

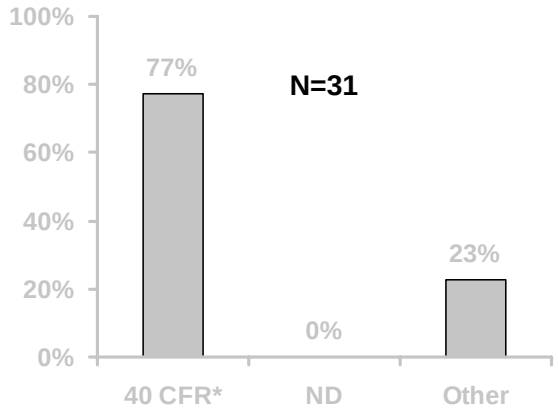
For NPDES Permits:



***8 respondents included qualifying notes under other. The notes were not included in the count for other.**

Question 1: How are detection limits determined in your State Clean Water Act Programs?

For other CWA programs, including ambient monitoring:



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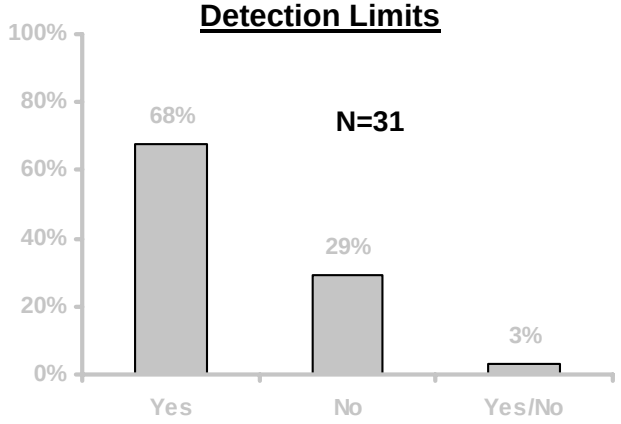
Question 2: Does your State regulation or accreditation program *require* laboratories to determine detection limits and quantitation limits?

Detection Limits



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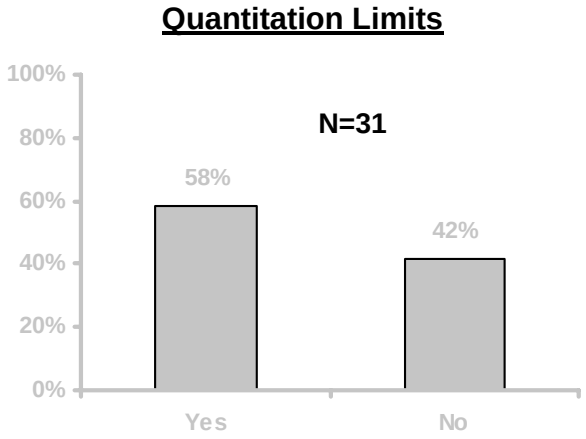
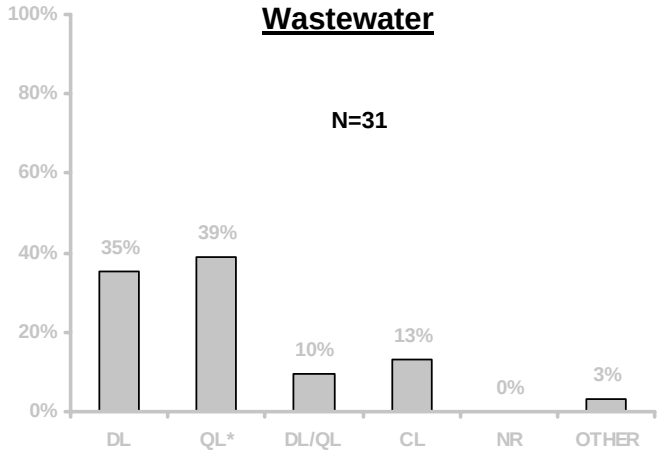


Question 3: In your State, what is the lowest reporting level required by laboratories that perform testing for certain pollutants in wastewater and ambient monitoring?



***2 respondents included qualifying notes under other. The notes were not included in the count for other.**

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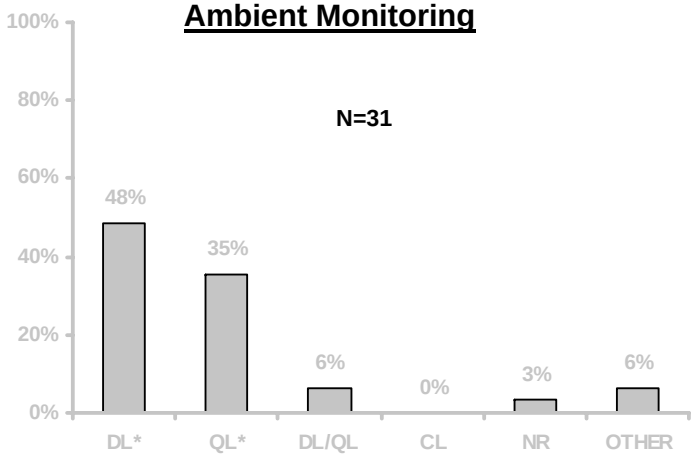
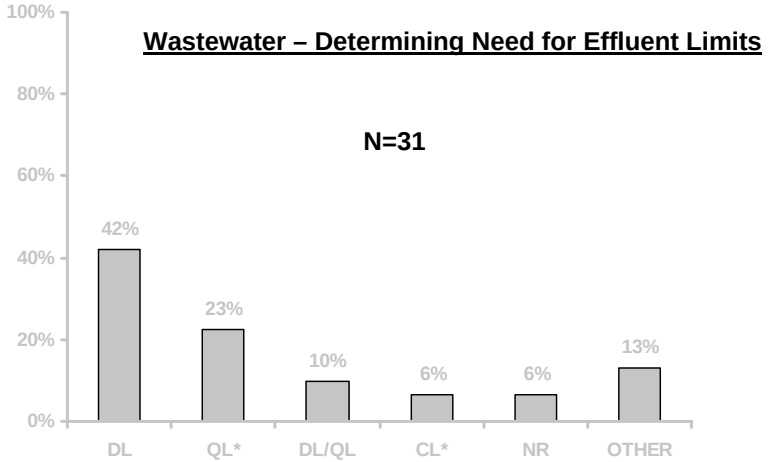


***1 respondent under each category included qualifying notes under other. The notes where not included in the count for other.**

Question 4: Where available analytical methods are insufficiently sensitive to assess compliance with applicable water quality standards, what is the lowest level at which your state makes regulatory decisions?



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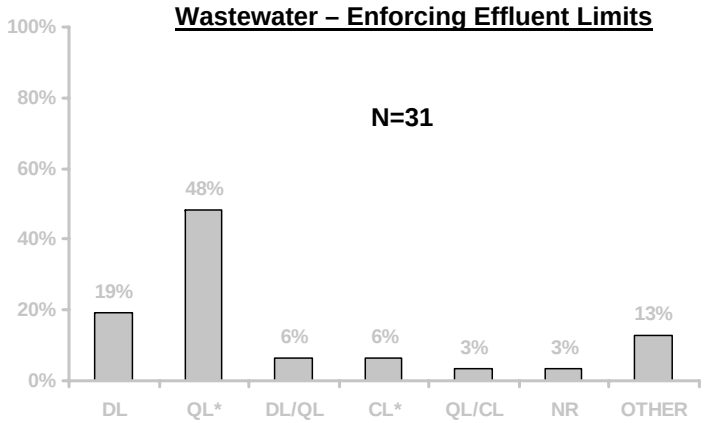

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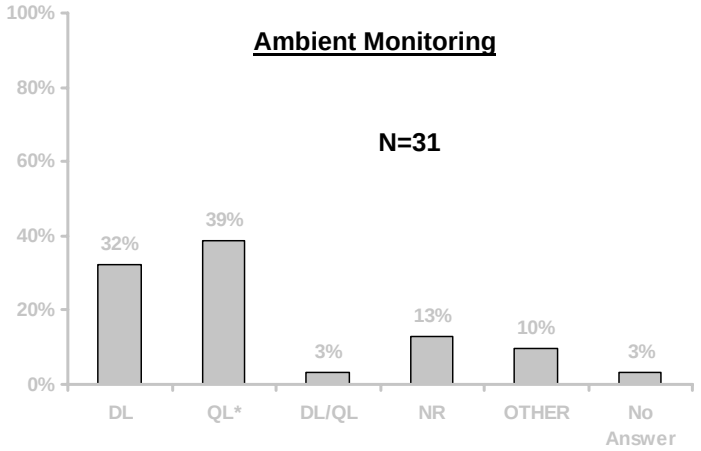

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Initial Observations

- Many approaches across the states – will make selecting options for detection/quantitation challenging
- A high percentage of states use the Method Detection Limit (MDL) procedure at 40 CFR, part 136, Appendix B to determine detection and/or quantitation limits
- There appears to be no "right" or even most popular way to use these values and some states have fairly complex decision matrices for setting requirements

Initial Observations (con't.)

- Many of the states responding use BOTH detection and quantitation levels in some way. This would seem to indicate that states believe there is usefulness for both concepts, although the additional narrative comments suggest significant differences in how quantitation and detection limits are used. Compliance limits determined from some expected achievable detection or quantitation limits are also not uncommon.

Questions?