COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER DIVISION

P.O.BOX 1105 **Richmond, VA 23218**

Subject: TMDL Guidance Memo No. 09-2001, Amendment No. 1. Guidance for monitoring of point sources using low-level PCB method 1668 for TMDL development

To: Regional Directors

From: Melanie D. Davenport, Director

Date: November 1, 2011

Copies: James Golden, Rick Weeks, Regional Water Permit Managers and Watershed Program Staff

Summary:
This amendment is to the Guidance for monitoring of point sources using low-level PCB method 1668 for TMDL development. It provides for the acceptance of PCB data generated using low level EPA Method 1668 revisions A, B, or C until EPA's rulemaking process is complete and Method 1668 version C is promulgated. Additionally, the guidance memo is modified to account for variability associated with the generation of total PCB (tPCB) concentrations in final effluent samples.

Electronic Copy:
An electronic copy of this guidance in PDF format is available for staff internally on DEQNET, and for the general public on DEQ's website at: http://www.deq.virginia.gov.

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Changes to Guidance Memo No. 09-2001. Guidance for monitoring of point sources using low-level PCB method 1668 for TMDL development

The following two changes are hereby made to Guidance Memo No. 09-2001 to account for concerns expressed by the Virginia Association of Municipalities (VAMWA) and the Virginia Manufacturing Association (VMA). First, EPA modified Method 1668 version B to C in a relatively short time frame thereby leading to a conclusion the method is suspect. Second, there is concern Method 1668 has not been validated in accordance with EPA guidance. In addition, VAMWA/VMA performed an inter-laboratory study where the results suggest inaccuracies are associated with tPCB effluent concentrations.

1. To address method changes, the paragraph below should be added to Guidance Sections I. and V.C. to replace the requirement for using 1668B or the most recent version:

   During the interim period while EPA is undergoing the rulemaking process to promulgate EPA Method 1668C within 40 CFR, rather than requiring the most recent version of 1668 be utilized, Method 1668 revisions A, B, C or other revisions issued by EPA prior to final promulgation are acceptable for use.

2. The following paragraph is added to Appendix C (**Sample Collection Methods for Effluent and Storm Water**), Section 3.3 (Quality Assurance Samples) of the Guidance to address the potential for tPCB variability in samples:

   To account for tPCB variability associated with sample collection, sample processing, or analytical variability, it is recommended that collection and analysis of split (i.e., duplicate) samples occur at a rate > 10%.