



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

SUBJECT: **Additions of Metals to Approved CWA Methods for Metals
Not in CFR 136.3 Table 1B**

OFFICE OF
WATER

FROM:  Richard Reding, Chief
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TO: Quality Assurance Managers
ATP Coordinators
NPDES Coordinators

DATE: November 7, 2007

The 304(h) methods branch recommends allowing the additions of metals for environmental permitting and compliance monitoring under the EPA's Clean Water Act (CWA) programs for metals not in CFR 136.6 Table 1B. This recommendation does not address laboratory certification requirements that states have mandated.

Recommendation on Method 200.7 (ICP-AES), Revision 4.4

EPA Method 200.7 may be used to determine all analytes listed in the method for compliance monitoring under the CWA although some were not included in the March 12, 2007 Federal Register notice. All general QC criteria (MDLs, IDC, blank spikes and duplicates, etc.) in the method must be met. Method 200.7 may not have the necessary sensitivity to achieve project reporting limits for some analytes (e.g. phosphorus and mercury), in which case approved methods with necessary sensitivity must be used.

Recommendation on Method 200.8 (ICP-MS), Revision 5.4

Boron, calcium, iron, magnesium, potassium, sodium, silica, tin, titanium and gold all have approved methods for use. In order for a permittee/laboratory to use Method 200.8 for reporting on National Pollution Discharge Elimination System (NPDES) samples and for samples on programs that reference 40 CFR 136.3, all general QC criteria (MDLs, IDC, blank spikes and duplicates, etc.) in the method must be met. Method 200.8 may not have the necessary sensitivity to achieve project reporting limits for some analytes in which case approved methods with necessary sensitivity must be used.

Documentation

No comparative data between methodologies have to be provided to EPA, but the permittee/laboratory must have a data package available for review that demonstrates that the lab can properly operate the instrument. The package for 200.7 or 200.8 must include copies of all the start-up information including calibrations, initial demonstration of capability, method detection limits, blanks, spikes, duplicates, run-log sequences, quality control checks, and a couple of examples of real world samples. For 200.8 - tuning checks must be performed and interference checks must include potential interferences that are commonly understood and often eliminated with the use of collision cells.

Please feel free to forward this information. If you have any questions regarding this memorandum, please contact Lemuel Walker of EASB/EAD/OST at walker.lemuel@epa.gov.

cc:

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