

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

LANL
General
(109055)

TO: Cathy Smith, EES-13, MS 992

DATE: January 5, 2000

FROM: Ken Mullen, ESH-18, MS-K497

MAIL STOP/TELEPHONE: K497/7-0818

SYMBOL: ESH-18/WQ&H:00-0006

SUBJECT: **APPROVAL OF ALTERNATE TEST PROCEDURES**

I have attached a letter from the Environmental Protection Agency approving our request to use updated versions of Clean Water Act methods that are not yet formally acknowledged in 40 CFR 136. ESH-18 programs may now use these modernized analytical procedures to improve data comparability between the multiple programs conducting studies in LANL watersheds. Descriptions of analyses and required quality assurance activities associated with the updated methods are described in the LANL Statement of Work for Analytical Laboratories and the ESH-18 Addendum.

KM/rm

Attachments: a/s

- Cy: Cathy Smith, EES-13, MS M992
- Mike Saladen, ESH-18, w/att., MS K497
- Mike Alexander, ESH-18, w/att., MS K497
- Steve Veenis, ESH-18, w/att., MS K497
- Penny Gomez, ESH-18, w/att., MS K497
- Billy Turney, ESH-18, w/att., MS K497
- Jim Davis, NMED/SWBQ, Santa Fe, New Mexico, w/att.
- Scott Wilson, EPA, Dallas, Texas, w/att.
- Everett Spencer, EPA, Dallas, Texas, w/att.
- Forrest Weesner, Neptune and Co., Los Alamos, New Mexico, w/att.
- WQ&H File, w/att., MS K497

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QUALITY BUREAU

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

DEC 03 1999

Ken Mullen
Water Quality & Hydrology Group
Los Alamos National Laboratory
Los Alamos, NM 87545

Dear Mr. Mullen:

Your request to recommend interim approval of several methods proposed on October 18, 1995 as Alternate Test Procedures for Use in Wastewater Compliance Monitoring using the updated methods 200.7, 200.8, 200.9 and 300.0 has been granted.

Region 6 grants the use of these methods on an interim basis, and any laboratory wishing to use these test methods must demonstrate the ability to achieve acceptable performance, and must keep a copy of such. Please review the November 16, 1999, letter from Dr. Maria Gomez-Taylor, AMS, OW for specific details (Attachment 1). Methods in the proposed Table 1B, October 18, 1995, can also be used on an interim approval for wastewater compliance monitoring.

Note that approval is not given to all methods published in the three manuals reference in your letter dated November 10, 1999, (Attachment 2). Only the methods proposed in the October 18, 1995, Table 1B can be used.

Should you need additional information, please feel free to call me, or contact Dave Stockton of my staff at (281) 983-2106.

Sincerely yours,

A handwritten signature in cursive script that reads "Lynda F. Carroll".

Lynda F. Carroll
Assistant Regional Administrator
for Management

Enclosures(2)

1. Letter dated Nov 16, 1999
2. Letter dated Nov 10, 1999

ATTACHMENT NO. 1



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

NOV 16 1999

OFFICE OF
WATERMEMORANDUM

SUBJECT: Recommendation for Interim Approval of Several Methods Proposed on October 18, 1995, as Alternate Test Procedures for Use in Wastewater Compliance Monitoring

FROM: Maria Gomez-Taylor
Analytical Methods Staff (4303) *Maria Gomez-Taylor*

TO: David Stockton
EPA Region 6

THRU: William A. Telliard, Director
Analytical Methods Staff (4303) *W. A. Telliard*

This memorandum responds to your request for a written recommendation regarding approval of several methods proposed in the *Federal Register* on October 18, 1995 (60 FR 53988), to be used as alternate test procedures in wastewater compliance monitoring by the Los Alamos National Laboratory. The specific methods listed in the request are EPA Methods 200.7, 200.8, 200.9, and 300.0.

On October 18, 1995, EPA proposed to amend the Guidelines Establishing Test Procedures for the Analysis of Pollutants under Section 304(h) of the Clean Water Act to replace or provide alternative methods to several currently approved methods. This was proposed to make new technologies available to the regulated community and to achieve greater consistency between the methods approved for use in the analysis of drinking water and those approved for the analysis of wastewater. The proposed methods are expected to be promulgated as part of a final rule to be published in the *Federal Register* at a later date.

In response to several requests from other Regional Offices, the Analytical Methods Staff (AMS) has previously recommended approval of the methods in the October 18, 1995 proposal on an interim basis. These methods, as indicated in Table 1B of the proposal (List of Approved Inorganic Test Procedures), are technically sound. Therefore, we recommend that Region 6 grant interim approval for the use of these methods in wastewater compliance monitoring to Los Alamos National Laboratory and any others requesting approval. However, any laboratory wishing to use these test methods must demonstrate the ability to achieve acceptable performance and must keep a copy of all required initial demonstration of capability data on file for review by federal and state auditors.

Interim approval for each alternate test procedure should be effective until the effective dates specified in the publication of the final rule(s) promulgating these methods in the *Federal Register*. At that time the laboratories must adhere to the final version of each method as referenced in the final rule(s).

Please note that we can not recommend the use of every test method that EPA has published in the three manuals referenced in the November 10, 1999 letter from Los Alamos. Some methods in these

Hg, Se, As?

manuals have not been evaluated or proposed for use in the EPA's Clean Water Act compliance programs. Therefore, I would suggest that Los Alamos provide a list of any other methods they would like to use. Depending on the request, Los Alamos may have to substantiate the performance of the method as specified in EPA's *ATP Protocol for Organic and Inorganic Analytes* before we can make a recommendation about approval or disapproval.

If I can be of any additional assistance on this matter or others, please write or call me at 202/260-1639 at your convenience.

ATTACHMENT NO. 2

Los Alamos

NATIONAL LABORATORY

*Los Alamos National Laboratory
Los Alamos, New Mexico 87545*

Date: November 10, 1999
In Reply Refer To: ESH-18/WQ&H:95-
Mail Stop: K497
Telephone: (505) 667-0818

David Stockton
United States Environmental Protection Agency
Region 6
10625 Fallstone Rd.
Houston, Texas 77099

Subject: Request to use published updated analytical methods

Per our conversation on June 7, 1999 we request permission to use the most recently published revisions of the following methods for Clean Water Act programs at Los Alamos National Laboratory (LANL). The water quality methods originally published in *Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020)* have been revised in the EPA publication *Methods for the Determination of Metals (EPA-600/4-91/010 and Supplement I, EPA/600/R-94-111, May 1994)* and *Inorganic Chemicals in Environmental Samples (EPA/600/R-93-100)*. While our conversation focused on the methods listed below, we desire approval to use any method included in these updated EPA publications for analytical services provided by any of the analytical laboratories used by LANL. If ruling on our ability to use all the recently updated methods would require additional time, please first advise us on the four specific methods listed below. A ruling on the suitability of the remaining methods described in the referenced sources may be provided in a follow up memorandum. For our immediate needs, we request permission to use the following updated methods at our discretion, unless a permit specifies otherwise.

Methods:

200.7 - "Determination of Metals and Trace Elements in Water and Wastes by Inductively Coupled Plasma-Atomic Emission Spectrometry"

200.8 - "Determination of Trace Elements in Water and Wastes by Inductively Coupled Plasma-Mass Spectrometry" (I have attached a November 3, 1992 letter recommending this method for approval under 40 CFR 136.)

200.9 - "Determination of Trace Elements by Stabilized Temperature Graphite Furnace Atomic Absorption Spectrometry"

300.0 - "Determination of Inorganic Anions by Ion Chromatography" (The attached letter also recommends this method for approval under 40 CFR 136.)

Thank you for your assistance. Please do not hesitate to call me at (505) 667-0818 if you have any questions.

Sincerely,



Ken Mullen
Water Quality and Hydrology Group

KM/km

Cy:

- Cathy Smith, BES-13, MS-M992
- Mike Saladen
- Mike Alexander
- Steve Vecnis
- Penny Gomez
- Billy Turney
- Scott Wilson, EPA
- Jim Davis, NMED-SWQB
- Everett Spencer, EPA
- WQ&H File, MS K497
- CRM-4, MS A150