

VARIANCE / FIELD CHANGE NOTICE

V/F No. 6

4338

WBS NO.: 2505-WP-0022

Page 1 of 1

PROJECT TITLE: Integrated Environmental Monitoring Plan, Rev. 2.

Date: 6/18/02

VARIANCE / FIELD CHANGE NOTICE (Include justification):

Requirement: NPDES samples collected for metals analyses are required per Table 4-5 to be analyzed using Methods 7000A, 3500, 6010B, 220.2, or 272.2.

Variance: To include on Table 4-5, Method 6020 from SW-846 and Method 200.8 from EPA/600/R-94/111 for non-mercury metals analysis by ICP/MS as additional options for NPDES metals analysis.

Justification: This method is needed to allow the on-site laboratory to continue to analyze these samples. Also see attached e-mail for justification.

INFORMATION ONLY

REQUESTED BY: Charles White *Charles White*

Date: 6/18/02

X IF REQD	VARIANCE/FCN APPROVAL	DATE	X IF REQD	VARIANCE/FCN APPROVAL	DATE
X	QUALITY ASSURANCE <i>Michael Lodge</i>	6-19-02	X	ENVIRONMENTAL COMPLIANCE <i>Fel...</i>	6/19/02
	DATA QUALITY MANAGEMENT		X	EM IEMP <i>Cynthia...</i>	6/18/02
X	ANALYTICAL SERVICES INORGANIC/ORGANIC ANALYSES <i>Carol Anderson</i>	6-19-02		OTHER	
	OTHER			OTHER	

VARIANCE/FCN APPROVED YES NO

REVISION REQUIRED: YES NO

DISTRIBUTION

PROJECT MANAGER:	DOCUMENT CONTROL: EC/DC	OTHER:
QUALITY ASSURANCE:	OTHER:	OTHER:
FIELD MANAGER:	OTHER:	OTHER:

/

White, Charles

From: Johnston, Frank
Sent: Tuesday, June 11, 2002 10:16 AM
To: Tabor, Cynthia; Meyer, Amy
Cc: Burke, Justin; White, Charles; Frank, Michael
Subject: RE: Metals Analyses for NPDES - on-site

ICP/MS is referenced as USEPA method 200.8. While Method 200.8 is not specifically cited in 40 CFR 136, USEPA published a supplement to EPA-600 in 1994 which includes ICP/MS (Method 200.8) as one of several multi-analyte methods for metals, the purpose of which is "for use in compliance monitoring of NPDES effluents as required under the Clean Water Act." (Re: Methods for the Determination of Metals in Environmental Samples, Supplement I, EPA-600/R-94/111, May 1994).

Given 200.8 is an approved method by USEPA for NPDES compliance purposes and it is superior to ICP my position is that ICP/MS is a compliant method under our NPDES permit. As long as we use a method that is equivalent to 200.8 we will be fine.

Frank

-----Original Message-----

From: Tabor, Cynthia
Sent: Tuesday, June 11, 2002 8:48 AM
To: Meyer, Amy
Cc: Burke, Justin; Johnston, Frank; White, Charles; Frank, Michael
Subject: RE: Metals Analyses for NPDES - on-site

Amy...If you need to change the method of analysis for any additional IEMP samples in the future please let me know as soon as possible so I can make sure everything is in place and that the new method meets the requirements in the plan. The method that you identify below is not what is listed in the IEMP and we will need to first check the regs (as I mentioned to Frank) and if it is acceptable we will need to write a variance to the IEMP (as the below method is not what is identified in the plan).

Thanks Cindy

-----Original Message-----

From: Meyer, Amy
Sent: Thursday, June 06, 2002 11:10 AM
To: Burke, Justin; Brennan, Debbie
Cc: Johnston, Frank; Tabor, Cynthia; Leslie, Kathy; Lynn Stephens (E-mail); Raines, Yvonne; Ron Houston (E-mail)
Subject: RE: Metals Analyses for NPDES - on-site

NPDES Metals will go to ICPMS. Contact Paul for specific method number. Amy

-----Original Message-----

From: Burke, Justin
Sent: Wednesday, June 05, 2002 1:05 PM
To: Brennan, Debbie; Meyer, Amy
Cc: Johnston, Frank; Tabor, Cynthia
Subject: Metals Analyses for NPDES - on-site

Greetings everyone,

Yvonne informed me that there was talk of a switch of who performs the on-site metals analyses for the NPDES surface water program from Debbie/Roy to Paul McSwigan. Is this accurate (Brenda didn't mention anything to me about this, but there was a lot to go over before she left and it may have been missed)?

If it is true, what will be the method for the analyses be (if you know and/or if it is different from the current methods) and when would this start (now)? If it is transitioning to Paul, I can get the methods from him if you don't have that info available. The only reason I ask is to get caught up and to be able to pass the info along to Yvonne so that it can be verified that the current setups in FACTS are accurate.