-----Original Message-----
From: AvocetLab@cs.com [mailto:AvocetLab@cs.com]
Posted At: Friday, April 20, 2007 2:35 PM
Posted To: Industrial Stormwater Comments
Conversation: Proposed NPDES Storm Water Changes comments
Subject: Proposed NPDES Storm Water Changes comments

To whom it may concern,

Avocet Environmental Testing in Bellingham, WA would like to offer feedback on proposed changes to the NPDES Industrial Storm Water General Permit. Our concerns are with the proposed Laboratory Quantification levels. Because EPA 1664 prescribes an MDL of 1.4 and a PQL of 5.0, I believe the listed Laboratory Quantification Levels refer to MDL and not the PQL, which is what we list as the low methodology limit on our reporting sheets.

Modern Turbidity Meters such as our have a minimum digital value (0.1) above zero which we have always used as our PQL. We are not sure what to make of the listed LQL of zero. Is zero and approprate PQL for a digital turbidimeter?

Current Storm Water permiting allows method EPA 200.8 or equivalent. We do all metals analysis by AA sm3113B or sm3111B, which are listed as acceptable equivalents for non-potable waters in the EPA Federal Register. MDLs are done yearly to assure the accuracy for the corresponding PQL. Our MDLs and PQLs are as low as we can achive for AA but may be higher that those of ICP, though far below the Benchmark Values for Storm Waters. Our PQL's are as follows:

Cu sm3113B .005 mg/L
Pb sm3113B .001 mg/L
Zn sm3111B .025 mg/L

We would very much like to continue our acceptable Federal Register equivalents to 200.8 on NPDES permit Storm water and hope that you can accommodate the Laboratory Quantification Levels appropriate to our methods.

Thank you very much for this opportunity to offer comments.

Mark Lorenz
Avocet Environmental Testing Supervisor
360-734-9033