



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

February 23, 2007

MEMORANDUM

To: Solid Waste Directors, Landfill Operators, North Carolina Certified Laboratories, and Consultants

From: North Carolina Division of Waste Management, Solid Waste Section

Re: Addendum to October 27, 2006, North Carolina Solid Waste Section Memorandum Regarding New Guidelines for Electronic Submittal of Environmental Data.

The purpose of this addendum memorandum is to provide further clarification to the October 27, 2006, North Carolina Solid Waste Section memo titled, "New Guidelines for Electronic Submittal of Environmental Data."

The updated guidelines is in large part due to questions and concerns from laboratories, consultants, and the regulated community regarding the detection of constituents in groundwater at levels below the previous practical quantitation limits (PQLs). The North Carolina Solid Waste Section solicited feedback from the regulated community, and, in conjunction with the regulated community, developed new limits. The primary purpose of these changes was to improve the protection of public health and the environment. The North Carolina Solid Waste Section is concerned about analytical data at these low levels because the earliest possible detection of toxic or potentially carcinogenic chemicals in the environment is paramount in the North Carolina Solid Waste Section's mission to protect human health and the environment. Low level analytical data are critical for making the correct choices when designing site remediation strategies, alerting the public to health threats, and protecting the environment from toxic contaminants. The revised limits were updated based on readily available laboratory analytical methodology and current health-based groundwater protection standards.

Definitions

Many definitions relating to detection limits and quantitation limits are used in the literature and by government agencies, and commonly accepted procedures for calculating these limits exist. Except for the Solid Waste Section Limit and the North Carolina 2L Standards, the definitions listed below are referenced from the Environmental Protection Agency (EPA). The definitions are also an attempt to clarify the meaning of these terms as used by the North Carolina Solid Waste Section.

Method Detection Limit (MDL) is the minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero.

Method Reporting Limit or Method Quantitation Limit (MRL or MQL) is the minimum concentration of a target analyte that can be accurately determined by the referenced method.

Practical Quantitation Limit (PQL) is a quantitation limit that represents a practical and routinely achievable quantitation limit with a high degree of certainty (>99.9% confidence) in the results. Per EPA Publication Number SW-846, the PQL is the lowest concentration that can be reliably measured within specified limits of precision and accuracy for a specific laboratory analytical method during routine laboratory operating conditions in accordance with "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods. The PQL appears in older NCDENR literature; however, it is no longer being used by the North Carolina Solid Waste Section.

Solid Waste Section Limit (SWSL) is the lowest amount of analyte in a sample that can be quantitatively determined with suitable precision and accuracy. The SWSL is the concentration below which reported analytical results must be qualified as estimated. *The SWSL is the updated version of the PQL that appears in older North Carolina Solid Waste Section literature. The SWSL is the limit established by the laboratory survey conducted by the North Carolina Solid Waste Section. The nomenclature of the SWRL described in the October 27, 2006, memorandum has changed to the SWSL.*

North Carolina 2L Standards (2L) are water quality standards for the protection of groundwaters of North Carolina as specified in 15A NCAC 2L .0200, Classifications and Water Quality Standards Applicable to the Groundwaters of North Carolina.

Method Detection Limits (MDLs)

Clarification of detection limits referenced in the October 27, 2006, memorandum needed to be addressed because of concerns raised by the regulated community. The North Carolina Solid Waste Section is now requiring laboratories to report to the method detection limit.

Method detection limits are statistically determined values that define the concentration at which measurements of a substance by a specific analytical protocol can be distinguished from measurements of a blank (background noise). Method detection limits are matrix-specific and require a well defined analytical method. In the course of routine operations, laboratories generally report the highest method detection limit for all the instruments used for a specific method.

In many instances, the North Carolina Solid Waste Section gathers data from many sources prior to evaluating the data or making a compliance decision. Standardization in data reporting significantly enhances the ability to interpret and review data because the reporting formats are comparable. Reporting a method detection limit alerts data users of the known uncertainties and limitations associated with using the data. Data users must understand these limitations in order to minimize the risk of making poor environmental decisions. Censoring data below unspecified or non-statistical reporting limits severely biases data sets and restricts their usefulness.

Solid Waste Section Limits (SWSLs)

Due to comments from the regulated community, the North Carolina Solid Waste Section has changed the nomenclature of the new limits referenced on Page 2 of the October 27, 2006, memorandum, from the North Carolina Solid Waste Reporting Limits (SWRL) to the Solid Waste Section Limits (SWSL). Data must be reported to the laboratory specific method detection limits and must be quantifiable at or below the SWSL. The SWSLs must be used for both groundwater and surface water data reported to the North Carolina Solid Waste Section. The PQLs will no longer be used.

The North Carolina Solid Waste Section has considered further feedback from laboratories and the regulated community and has made some additional changes to the values of the SWSLs. These changes may be viewed on our webpage:

<http://www.wastenotnc.org/sw/swenvmonitoringlist.asp>

Analytical Data Reporting Requirements

The strategy for implementing the new analytical data reporting requirements involves reporting the actual laboratory method detection limit with all analytical laboratory results along with the following requirements:

1) Any analyte detected at a concentration greater than the MDL but less than the SWSL is known to be present, but the uncertainty in the value is higher than a value reported above the SWSL. As a result, the actual concentration is estimated. The estimated concentration is reported along with a qualifier (“J” flag) to alert data users that the result is between the MDL and the SWSL. Any analytical data below quantifiable levels should be examined closely to evaluate whether the analytical data should be included in any statistical analysis. A statistician should make this determination. If an analyte is detected below the North Carolina 2L Standards, even if it is a quantifiable concentration, compliance action may not be taken unless it is statistically significant increase over background.

These analytical results may require additional confirmation.

2) Any analyte detected at a concentration greater than the SWSL is present, and the quantitated value can be reported with a high degree of confidence. These analytes are reported without estimated qualification. The laboratory’s MDL and SWSL must be included in the analytical laboratory report. Any reported concentration of an organic or inorganic constituent at or above the North Carolina 2L Standards will be used for compliance purposes, unless the inorganic constituent is not statistically significant). Exceedance of the North Carolina 2L Standards or a statistically significant increase over background concentrations define when a violation has occurred. Any reported concentration of an organic or inorganic constituent at or above the SWSL that is not above an North Carolina 2L Standard will be used as a tool to assess the integrity of the landfill system and predict the possibility that a constituent concentration may exceed the North Carolina 2L Standards in the future.

These analytical results may be used for compliance without further confirmation.

Failure to comply with the requirements described in the October 27, 2006, memorandum and this addendum to the October 27, 2006, memorandum will constitute a violation of 15A NCAC 13B .0601, .0602, or .1632(b), and the analytical data will be returned and deemed unacceptable. Submittal of unacceptable data may lead to enforcement action.

Electronic Data Deliverable (EDD) Submittal

The North Carolina Solid Waste Section would also like to take this opportunity to encourage electronic submittal of the reports in addition to the analytical laboratory data. This option is intended to save resources for both the public and private sectors.

The North Carolina Solid Waste Section will accept the entire report including narrative text, figures, tables, and maps on CD-ROM. Please separate the figures and tables from the report when saving in order to keep the

size of the files smaller. The CD-ROM submittal shall contain a CD-ROM case and both CD-ROM and the case shall be labeled with the site name, site address, permit number, and the monitoring event date (MM/DD/YYYY). The reporting files may be submitted as a .pdf, .txt, .csv, .xls, or .doc type.

Also, analytical lab data and field data should be reported in .xls files. The North Carolina Solid Waste Section has a template for analytical lab data and field data. This template is available on our webpage: http://www.wastenotnc.org/swhome/enviro_monitoring.asp. Methane monitoring data may also be submitted electronically in this format.

Pursuant to the October 27, 2006, memorandum, please remember to submit a Solid Waste Section Environmental Monitoring Reporting Form in addition to your environmental monitoring data report. This form should be sealed by a geologist or engineer licensed in North Carolina if hydrogeologic or geologic calculations, maps, or interpretations are included with the report. Otherwise, any representative that the facility owner chooses may sign and submit the form. Also, if the concentration of methane generated by the facility exceeds 100% of the lower explosive limits (LEL) at the property boundary or exceeds 25% of the LEL in facility structures (excluding gas control or recovery system components), include the exceedance(s) on the North Carolina Solid Waste Section Environmental Monitoring Reporting Form.

If you have any questions or concerns, please feel free to contact Jaclynne Drummond (919-508-8500) or Ervin Lane (919-508-8520).

Thank you for your continued cooperation with this matter.