

ARCHIVE: Archived because revisions made to VAP rules in 2002 in OAC Chapter 3745-300 render this guidance unnecessary. However, this document is accurate under the 1996 VAP rules.

TITLE: Update III and CL Certification

DATE

EFFECTIVE: 1998

KEYWORDS: Closed Purge-and-Trap and Extraction for Volatile Organic Compounds (VOCs), Method 5035, SW 846: Update III, field preservation method, EnCore™ sampler, VAP laboratory certification

RULES: OAC 3745-300-04(E)(3)

QUESTION: Does the VAP require certified laboratories (CLs) to follow Update III Method 5035 of SW -846 when analyzing for VOCs?

ANSWER: There are no present or proposed requirements within the VAP for CLs to use Update III, Method 5035 of SW 846. Laboratories that want to add and/or change Update III to their certification may do so under technical assistance during renewal of their certification, or payment of the annual fee. The United States Environmental Protection Agency has issued a new document, SW-846 Update III, which contains a promulgated method (5035) for the sampling and analysis of environmental and waste samples. Currently, these methods are not required by the Voluntary Action Program (VAP) rules. Although Method 5035 is in the process of being reviewed by the VAP and Agency staff, a recommendation to revise the Phase II rule to include 5035 field techniques has not been made. Method 5035 will only be required for sampling volatiles in soil media (on VAP properties) if a revision to the Phase II rule is made which requires the 5035 field preservation techniques and/or Encore™ Sampler use. Revisions to the Phase II or any other VAP rule will not occur without a public hearing and opportunity for the public to provide written and/or oral comment as required by Ohio's rule adoption/revision procedures.

Please note that any laboratory can submit SW-846 Update III methods and protocols to the VAP for review and approval under

OAC 3745-300-04(E)(3). Therefore, it is possible to obtain VAP Certified Laboratory data using these methods and protocols.

CLs desiring either to change their certification to include or add Update III to the Solid Waste methods listed on an existing certificate(s) may request these changes within the VAP through technical assistance. Certified laboratories may only request this technical assistance when rendering payment of their annual fee of \$3,000.00, or upon renewal of their certification. When requesting such technical assistance, laboratories must submit the following information and documentation:

- A cover letter requesting technical assistance including a list of analytes, or parameter groups, and methods for which the laboratory seeks to **update and remove** from their certificate;
- Revised standard operating procedures including digestion, preparation, or extraction procedures;
- A revised quality assurance manual;
- Method detection limit (MDL) studies for each method. MDL studies must be provided for each digestion, preparation, or extraction procedure;
- A photocopy of the check for the renewal fee (the actual check is mailed directly to OEPA's Fiscal Office)

Laboratories wishing to maintain dual certification for methods (e.g., 8260A and 8260B) are only required to analyze one performance evaluation (PE) ampule for both methods during a periodic PE study; however, laboratories failing the periodic PE criteria in paragraph (D)(1)(b) of rule 3745-300-04 of the Administrative Code will receive suspension for both methods. Laboratories may also be required to analyze additional PE ampules which include compounds added to the method in Update III (e.g., PCB congeners in 8082).

Laboratories seeking to update Total Petroleum Hydrocarbon (TPH) to method 8015B will have certification restricted to only the analysis of TPH. Also, laboratories certified for either 8020A or 8010B, which request a change to 8021B, must analyze a volatile ampule, pass the acceptance criteria in paragraph (D)(1)(a) of rule 3745-300-04 of the

Administrative Code, and apply for this method in accordance with paragraph (R) of the aforementioned rule.

SUMMARY:

There are no present or proposed requirements within the VAP for CLs to use update III, Method 5035 of SW 846. Laboratories that want to add Update III to their certification may do so under technical assistance during renewal of their certification, or payment of the annual fee. In some circumstances, laboratories may wish to maintain their present certification or obtain dual certification in order to maintain consistent analytical results between data sets for the same site.

**OHIO EPA
CONTACT:**

For any questions concerning this issue, please contact the VAP central office at (614) 644-2924.