

O'Neill, Christopher (DEC)

From: O'Neill, Christopher (DEC)
Sent: Tuesday, April 02, 2019 11:15 AM
To: 'Tom Johnson'
Cc: Mark Williams; Stefan Truex; Charles Porreca; Beverly Commerford; Mustico, Richard X (DEC); Karpinski, Steven (HEALTH); Deming, Justin H (HEALTH)
Subject: RE: Troy Belting (BCP#C401067) 1,4-dioxane analysis

NYSDEC has no objection to limiting the reported groundwater sampling analytical results for 1,4-dioxane to those generated by EPA Method 8270D SIM, as you have described below.

Chris O'Neill
NYSDEC – Schenectady
518-357-2394

From: Tom Johnson [mailto:johnsont@sterlingenvironmental.com]
Sent: Tuesday, April 02, 2019 10:26 AM
To: O'Neill, Christopher (DEC) <christopher.oneill@dec.ny.gov>
Cc: Mark Williams <mark.williams@sterlingenvironmental.com>; Stefan Truex <Stefan.Truex@sterlingenvironmental.com>; Charles Porreca <charles.porreca@sterlingenvironmental.com>; Beverly Commerford <beverly.commerford@sterlingenvironmental.com>
Subject: Troy Belting (BCP#C401067) 1,4-dioxane analysis

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Chris:

We have been experiencing a consistent issue when analyzing 1,4-dioxane by both Method 8260 and Method 8270D SIM at sites where data validation is required (e.g., BCP sites). As you are aware, 1,4-dioxane is analyzed by Method 8270D SIM to achieve the necessary lower detection limit; however, 1,4-dioxane results typically also are reported by Method 8260.

The problem arises during data validation where 1,4-dioxane results by Method 8260 often are rejected as unusable because the relative response factor is below the allowable minimum in the associated initial and/or continuing calibration, while the results for 1,4-dioxane analyzed by Method 8270D SIM are acceptable. There is a potential for confusion if there are both rejected results and acceptable results for the same compound in the same sample. Sterling's solution to this issue is to have the lab not report the 1,4-dioxane results by Method 8260 so the data are not rejected during data validation, opting instead to report only the more accurate Method 8270D SIM results. Please confirm your agreement with this approach for the upcoming groundwater sampling event at the Troy Belting facility.

Thanks,
Tom

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