



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

October 22, 2012

Dear State Permitting Authority:

This letter addresses the procedures used by the U.S. Environmental Protection Agency Region III (EPA) for Limited Use Alternate Test Procedure (ATP) Approval for Methods or Method Modifications¹, not currently listed in 40 CFR Part 136 for use in the NPDES Permit Program: **Limited Use ATP, Category #2 Methods**. This letter **specifically** details procedures **for an analytical method for which EPA's Engineering & Analysis Support Branch (EASB) has given a positive evaluation ("interim approval")**. However, rulemaking for National use has not been conducted. This information should be shared with potential ATP applicants.

A. Application

Prior to use of a method for compliance monitoring an application is required to be provided to the Director of the State Agency having responsibility for issuing the NPDES permits within such States, i.e., permitting authority. The Director will forward the application to the Regional ATP Coordinator with a recommendation for or against approval.

An application may be made by letter, email or hardcopy. The application is to include the following information:

- (1) Provide the name and address of the applicant and the applicable ID number of the existing or pending permit and issuing agency for which use of the ATP is requested, and the discharge serial number.
- (2) Identify the pollutant or parameter for which approval of an ATP is being requested.
- (3) Provide justification for using testing procedures other than those specified in Tables IA through IH of §136.3, or in the NPDES permit.
- (4) Provide a copy of the method per the interim approval.

The purpose of the application information is to assure that the state and EPA regional regulatory authorities concur with EASB's positive evaluation and to help track the use of the method until officially included in 40 CFR Part 136.

B. Analytical Procedures, Quality Control and Documentation

A laboratory requesting Region III approval for a category #2 limited use ATP must follow the analytical procedures, including quality control steps, as per the method given interim approval status by the EASB. The laboratory is to retain the analytical records to document these results as required for all routine NPDES compliance analyses.

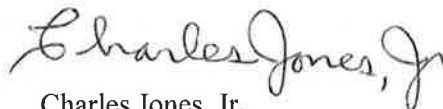
C. Approval for Limited Use ATP

(1) After a review of the application by the Regional ATP Coordinator, the Regional ATP Coordinator notifies the appropriate state agency of approval or rejection for the use of the ATP. The State Authority notifies the applicant of the decision. The approval may be restricted to use only with respect to a specific discharge or facility (and its laboratory) at the discretion of the Regional ATP Coordinator. If the application is not approved, the Regional ATP Coordinator shall specify what additional information might lead to a reconsideration of the application.

(2) The Regional ATP Coordinator will forward a copy of every approval and rejection notification to the National ATP Coordinator as well as to the Water Protection Division of EPA Region III.

If you have any questions regarding this correspondence, please contact me at (215) 814-2734.

Sincerely,

A handwritten signature in cursive script that reads "Charles Jones, Jr.".

Charles Jones, Jr.
Regional ATP Coordinator

cc:

Matthew Colip - DMR-QA Coordinator, Water Protection Division, EPA Region III

Cristina Fernandez, Deputy Director, Environmental Assessment and Innovation Division, EPA Region III

¹ Refer to 40 CFR Part 136, May 18, 2012 updated June 18, 2012, Section 136.6 for definition and guidance involving changes considered allowable "method modifications" (that do not require ATPs, but are limited to specific changes and require specific documentation to be kept on file as detailed in 136.6).