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**STATUS OF THE EPA PROPOSAL TO ADOPT METHOD 1668 FOR PCB ANALYSIS IN AMBIENT WATERS**

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**ABSTRACT:** On September 23, 2010, EPA proposed approval Method 1668C for polychlorinated biphenyls (PCBs) along with other analytical method changes. The proposed rulemaking had a 30-day comment period and 39 pages of comments were entered into the docket. The proposed extremely sensitive test method is for analysis of PCBs, for use in issuing permits and assessing compliance under the Clean Water Act. The PCB water quality criterion of 64 parts per quadrillion (ppq) measures compliance based on the sum of all 209 PCB congeners. Concerns that were expressed in the comments include analytical, cost, and compliance concerns. Analytical concerns include that the EPA interlaboratory validation study of Method 1668A included only a water matrix and it does not support validation of the method for wastewater, biosolids, tissue, soil, and sediment; the ubiquitous nature of background contamination that shows up in blanks in Method 1668(C); and the method for summing congener values include congener values that are below the "Minimum Level". The costs of PCB testing using Method 1668C while substantial, are not the largest costs that will result from approval of that method. The most significant cost impact will result from the triggering of requirements to comply with stringent effluent limits for PCBs. Many States have adopted water quality standards for PCBs that are based on bioaccumulation or bioconcentration methodologies, which result in standards in the parts-per-quadrillion range. Compliance concerns come into play once those PCB limits are included in permits, with Method 1668 being required to measure compliance. The treatment options for removal of PCBs are very limited and those technologies that are available to reduce PCB levels (if not to the required limits) are costly.

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