| Draft Fact Sheet – Pierce County Sewer Division Comments<br>August 16, 2021 | | | |
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| **Fact Sheet Section** | **Current Language** | **Comments/Suggested Modification** | **Impacts and/or Results** |
| Summary (cover page) | The permit ***authorizes*** the discharge of municipal wastewater containing total inorganic nitrogen. | Change 'authorizes' to 'regulates.'<br><br>The permit ***regulates*** the discharge of municipal wastewater containing total inorganic nitrogen. | Clarity |
| General Permit Approach (pg. 12) | In addition, critical benefits to a general permit for municipal dischargers include an equitable roll out of nutrient controls in the region and a shared basis for working together to develop treatment solutions that **may ultimately include** a water quality trading framework. | This summary does not provide a definitive direction on Ecology's future strategy. Developing a water quality trading framework has been brought up by utilities during this permit development process with minimal perceived interest from Ecology or the other NGOs. | Provide clear direction |
| General Permit Approach (pg. 13) | Ecology has prioritized permit reissuance schedules in the Northwest and Southwest Regions working towards minimizing the current permit backlog. | Ecology's backlog of permit reissuances is significant. Ecology should make a clear and definitive commitment on reducing this backlog to ensure permit reissuances do not continue to be an issue moving forward. Also, Ecology should make a commitment on timeline for reissuance on future permits once the backlog has been reduced (e.g. permits will be renewed within six (6) months of their expiration, unless delays occur that are outside of their control). | Timely Permit Reissuance |
| Table 2. Proposed PSNGP Permittees (pg. 13) | Chambers Creek WWTP is not the correct facility name. | Many of the municipalities are identified by the organization (e.g. King County) and also by the WWTP facility (e.g. Brightwater WWTP). If Ecology is using a consistent approach, Chambers Creek would be identified as **'Pierce County Chambers Creek Regional WWTP.'** | Consistent identification of facilities within PSNGP Permittee Table 2 |
| Technology-Based Limitations (pg. 18) | The AKART provision needs evaluation on a case-by-case basis given its direct ties to economic impact. What constitutes AKART at one facility may be different at the next. This is especially true when considering the size difference between WWTPs, available space for expansion at the existing location, costs of additional treatment processes, the rate payer base and any identified hardship that may exist due to the median household income in the community. | If Ecology is not proposing TBELs as a provision of AKART, why are we assessing what it would take to obtain 3 mg/L as an annual average? Establishing WQBEL based on the bounding scenarios of the Salish Sea Model should be the basis for lower level regulation. | Reasonable Requirements/assessments |

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| Surface Water Quality Limits (pg. 19) | When surface water quality-based limits are more stringent or potentially more stringent than technology-based limitations, they must be used in a discharge permit. | With this statement, isn't the inverse argument also true? Why should TBEL limits be considered if surface water quality-based limits don't require treatment to these lower thresholds. This could be considered punishment for early adopters that were forward thinking by installing infrastructure to comply with future regulations. | Reasonable Requirements/assessments |
| Antidegradation (pg. 21) | Each time Ecology reissues the PSNGP, the agency will evaluate the effluent limits and permit conditions to determine if the revised permit should incorporate additional or more stringent requirements. | This statement provides flexibility to add additional permit conditions based on future needs. This provides additional support for removing the AKART assessment for obtaining a 3 mg/L annual average in this first permit cycle. | Reasonable Requirements/assessments |
| Numeric Criteria for the Protection of Human Health (pg. 22) | Ecology has not established a critical condition for the Puget Sound region at this time. Longer residence times occur in **Puget Sound during summer months when watershed inflows subside**.<br><br>Narrative limits will apply for the entire first permit cycle and the critical condition for the receiving water will be considered as part of the second permit iteration.<br><br>The proposed permit does not authorize mixing zones specific to total inorganic nitrogen. | These statements continue to support removing the AKART study for obtaining 3 mg/L on an annual average as it is not necessary and or obtainable. WQBEL should identify the need for additional assessments for each of the Puget Sound dischargers on a case by case basis. | Reasonable Requirements/assessments |
| Description of the Receiving Water (pg. 22) | It would be helpful to include the 303(d) listed portions of the Salish Sea or at the very least a hyperlink to that list here. | It would be helpful to include the 303(d) listed portions of the Salish Sea or at the very least a hyperlink to that list here.<br><br>Also, the 303(d) list does not reflect the impairment throughout the Puget Sound that would warrant the level of regulation/monitoring that is proposed within this draft PSNGP. For this reason, the AKART assessment should be put on hold until WQBELs can be established. | Clarify<br><br>Reasonable Requirements/assessments |

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| Marine Aquatic Life Uses and Corresponding DO Criteria (pg. 26) | The Salish Sea's shallow bays and terminal inlets, like Budd Inlet in South Puget Sound, are the most sensitive to eutrophication due to diminished flushing rates when compared to other basins with higher rates of water exchange. | Why is LOTT exempt from conducting a Nutrient Reduction Evaluation (NRE) for obtaining an annual average of 3 mg/L if they are located at a terminal inlet with diminished flushing and are not anywhere close to obtaining 3 mg/L on an annual average. This requirement should be removed from the permit for this first PSNGP. | Reasonable Requirements/assessments |

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| The Salish Sea Model (SSM) – (pg. 30) | The following key findings from the Bounding Scenarios report led Ecology to make this determination:<br><br>• Consistent with the findings from Mohamedali, et.al (2011), WWTPs contribute a much larger proportion (92%) of the anthropogenic DIN loads to Washington waters of the Salish Sea **during the low flow season.** | This statement clearly identifies the need for seasonal considerations, but not annual average load regulations. Further discussions will need to occur once the bounding scenarios are available that identify the WQBEL for each permitted discharger.<br><br>***As stated by Ecology, "early results indicate greater need for water quality improvement from annual point source load reductions and also confirm the need for watershed reductions to attain standards.***<br><br>***"Ecology plans to use the Year 2 optimization scenarios to evaluate targets for individual basin load reductions, watershed inflow load reductions and point source watershed allocations for different basins. These Year 2 scenarios will constitute the basin from which numerical WQBELs will be developed."***<br><br>***"Ecology establishes reasonable potential for a discharge or group of dischargers to violate surface water quality standards, the agency must implement water quality based effluent limit (WQBEL) for that pollutant."***<br><br>These statements validate that it is too early to begin high level assessments until it can be confirmed they are needed. | Reasonable Requirements/assessments |

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| Condition S3. Compliance with Standards (pg. 35) | The suite of BMPs that constitute narrative WQBELs are unique to this permit term. They require the permittee to document and assess the adaptive management procedures used to reduce nutrients in the effluent. | Utilizing narrative WQBELs is an interim nutrient reduction strategy and not a long-term solution. With this said, Ecology needs to be mindful of the implications involved in the anti-backsliding regulation and ensure this permit is a first step in a progressive regulatory framework and does not over regulate in the short-term while waiting for the Salish Sea Model bounding scenario results. | Reasonable Requirements/assessments |
| Anti-Backsliding (pg. 37) | NPDES permits may not be reissued or modified with less stringent limitations or conditions than those defined in a previous permit unless the changes comply with anti-backsliding requirements. | Ecology needs to be mindful of the implications involved in the anti-backsliding regulation and ensure this permit is a first step in a progressive regulatory framework and does not overregulate in the short-term while waiting for the Salish Sea Model bounding scenario results. | Reasonable Requirements/assessments |
| S1. Permit Coverage (pg. 38) | Categories for domestic WWTPs that must apply for coverage under the draft permit are identified using (D) and (S) for dominant and small TIN Loads in draft permit section… | The term 'dominant' is not appropriate for classifying larger WWTPs that discharge to the Puget Sound. By definition, the term dominant means most important, powerful, or influential and the opposite of dominant is not "small" but rather weak, characterless, deficient, deplorable. The term 'Largest Loaders' is used within the Fact Sheet and better reflects the situation. Pierce County would propose using 'Largest Loaders' (LL) for large dischargers and 'Smallest Loaders' (SL) for small quantity dischargers. | Perception |
| S1. Permit Coverage (pg. 39) | Fourth paragraph – there are words missing | "Ecology must limit coverage under the general permit" | Completes the sentence |
| S1. Permit Coverage (pg. 39) | Ecology **plans** to develop these additional watershed modeling tools during the first PSNGP five-year term. | Change **'plans'** to **'will'**<br><br>Ecology **will** develop these additional watershed modeling tools during the first PSNGP five-year term. | Clarify intent |

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| S4. Requirements for WWTPs with Dominant TIN Loads (pg. 42) | Permittees may request an action level reassessment after completing one year of sampling. In order for Ecology to accept their request to reassess the action level, Permittees mush show that the overall loading to the facility has not increased by providing an influent BOD5 load comparison. | This statement could lead to moratoriums as most systems are seeing some increase in loading. Recommend that Ecology changes this language to allow some flexibility by stating they will reassess action levels on a case by case basis. | Reasonable Requirements/assessments |
| S4. Draft Condition S4.C Nitrogen Optimization Plan (pg. 42) | For the largest loaders, submittal of the annual Nitrogen Optimization Plan (NOP) via the Annual Report Requirement constitutes a portion of the narrative WQBEL for this 5-year permit term as it represents an adaptively managed BMP. | Facilities that have been actively moving forward with seasonal nutrient reduction should get credit for their work over the past few years. If nutrients are being reduced below the action thresholds through a biological nutrient reduction process, some of these reporting criteria should be waived/reduced. | Reasonable Requirements/assessments |
| Page 42 S4.C | "To reduce nitrogen to the greatest extent possible during the permit term." | How will the reporting requirements within this general permit actually make this happen? As long as treatment plants are implementing optimizations strategies and staying below their action limit, they shouldn't have to focus on extensive justification documents. | Reasonable Requirements/assessments |
| S4. Draft Condition S4.C Nitrogen Optimization Plan (pg. 43) | In the Annual Report, Permittees must document optimization opportunities at their WWTP, implementation process, the success of the implementation strategy compared to expected performance, any necessary refinements to improve performance, and the application of adaptive management. | Nutrient reduction is one part of wastewater treatment. Once the system is operational and performing as intended, the changes will not be drastic. Year after year the plan will stay the same with minor alterations. Updating this strategy on an annual basis is not necessary and causes an administrative burden. | Reasonable Requirements/assessments |
| S4. Draft Condition S4.C Nitrogen Optimization Plan (pg. 43) | Permittees must begin to identify optimization strategies starting upon the effective date of the PSNGP, following receipt of the coverage letter from Ecology with implementation occurring as soon as possible during permit year 1. | ASAP is not a clear and definite time frame to which you can hold permittees accountable. A concrete date by which each facility must begin implementing its first optimization strategy provides accountability. | Clear, direct, provides accountability |

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| Draft Condition S4.C.1 Treatment Process Performance Assessment (pg. 45-46) | Permittees must conduct a process evaluation to establish current treatment performance and the existing TIN removal rates. This process evaluation may be conducted through process modeling or an equivalent analysis. | The Chambers Creek Regional WWTP has conducted four seasonal nutrient reduction pilots. Requiring Pierce County to perform this analysis would not benefit our performance at all as we have been actively testing the various control strategies. Ecology should give credit for proactive efforts and remove this requirement for WWTP that have been proactively performing seasonal nutrient reduction pilots. | Reasonable Requirements, while incentivizing early adoption |
| Draft Condition S4.C.1 Treatment Process Performance Assessment (pg. 45) | Determine the three most viable optimization strategies capable of achieving the goal | What if there are not three viable options? | Clarify |
| Draft Condition S4.C.1 Treatment Process Performance Assessment (pg. 46) | Permittee must develop an anticipated performance metric. | All plants use a performance metric to measure their overall success for each parameter. Some of these requirements should not be included in the permit as they are more the means and methods of process control strategies. Ecology should focus more on the final performance of the facility and less on the nuances of process control for one specific parameter. | Reasonable Requirements/assessments |
| Draft Condition S4.C.1 Treatment Process Performance Assessment (pg. 46) | Permittees must also document how they implemented the preferred optimization strategy including costs, the time required for full implementation, the start date of the preferred strategy, unanticipated challenges, and impacts to the overall treatment performance as a result of any process changes. | This requirement should not be included in the permit as they are more the means and methods of process control strategies. Ecology should focus more on the final performance of the facility and less on the nuances of process control for one specific parameter. This requirement will add significant administrative burden on the facility and ultimately this has no positive influence on plant performance. Requirements like this will strain limited resources and divert the effort from actual performance to another administrative exercise. | Reasonable Requirements, while incentivizing early adoption |

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| Draft Condition S4.C.1 Treatment Process Performance Assessment (pg. 46) | Ecology intends for the implemented optimization strategies to help each Permittee stay below their facility specific action level. This prevents additional nitrogen loading into Puget Sound during the period while Ecology completes modeling necessary to determine numeric WQBELs. | The requirements within this permit demonstrate the lack of trust within this process. Many of the requirement seem to need continuous justification through extensive reporting. Requiring this level of documentation would not be useful to plant operations as things change daily. | Reasonable Requirements/assessments |
| Draft Condition S4.C.2 Optimization Implementation (pg. 46) | Permittees must maintain a prioritized list of optimization strategies at all times and update that list as part of the Annual Report requirement. | Is there a specific place that this list should be kept? Does Ecology keep it? On PARIS? | Clarity, accountability |
| Draft Condition S4.C.2 Optimization Implementation (pg. 46) | Adaptive management is required if the Permittee stayed below the action level but did not meet the performance metric. | Need a definition of Adaptive Management. | Clarity, accountability |
| Draft Condition S4.D. Action Level Exceedance Corrective Actions (pg. 47) | Strategies considered for reducing loading must include increasing production volumes of reclaimed water (if applicable to the facility), implementing side stream treatment for portions of return flow from solids treatment, … | Ecology should be recognizing facilities that have proactively implemented nutrient reduction measures by reducing the reporting requirements within this permit. Pierce County implemented side stream treatment in 2017 and have ran four consecutive seasonal nutrient reduction pilots since 2018 - present. None of this forward thinking or initiative is reflected in these permit requirements. Ecology should reduce the reporting requirements for facilities that are well into this process. | Reasonable Requirements/assessments |
| Draft Condition S4.D. Action Level Exceedance Corrective Actions (pg. 48) | An update to the WWTP's Operations and Maintenance manual must be provided to Ecology no later than 30 days after implementation so that facility records are kept current. | This should continue to be an annual update requirement. The plant process is highly integrated and making one-off changes will lead to inaccuracies within the plant O&M documentation. Many of the plant O&Ms are now electronic and organizations have put processes in place with multiple levels of review to ensure they continue to be accurate. This process can take multiple months to allow adequate time for review/comment. This is an unrealistic requirement. | Reasonable Requirements/assessments |

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| Draft Condition S4.D. Action Level Exceedance Corrective Actions (pg. 47-48) | "Permittees must also develop a program to reduce influent TIN loads." "Permittees must also begin to identify different approaches for reducing TIN from new dense residential development and commercial buildings." | This requirement should be removed as this is a very broad and long-term exercise. Accomplishing this task will require state and federal changes to building code, zoning regulations, as well as industry and development standards and as such is probably better suited to a state agency as opposed to individual sewer providers. | Reasonable Requirements/assessments |
| Draft Condition S4.E. Nutrient Reduction Evaluation (pg. 48) | LOTT does not need to complete the NRE requirement described in Condition S4.E. This treatment plant already has an effluent limit below 3 mg/L TIN in their individual NPDES permit for TIN during the critical season of April through October. | Why is LOTT excluded and not other facilities with nutrient reduction capabilities/infrastructure? This NRE includes a requirement to assess reaching 3 mg/L on both a seasonal and annual average. LOTT is not obtaining this goal as they reduce their TIN only during the summer months. Budd Inlet's water quality is of high concern, so why would other facilities need to go through this effort if it is not necessary in an area with significant water quality impairment. | Reasonable Requirements/assessments |
| Draft Condition S4.E. Nutrient Reduction Evaluation (pg. 49) | Ecology expects final numeric effluent limits for domestic WWTPs in the region to be a mix of technology and water quality-based limits. | How will this statement be factored into the bounding scenarios? Will Ecology select the regulatory framework for a facility on a case-by-case? How do facilities anticipate if they will fall under TBELS or QBELS? Will this be based on the modeling results and Ecology will use the more stringent of the two? | Clarify Statement |
| Draft Condition S4.E. Nutrient Reduction Evaluation (pg. 50) | In addition to making an AKART determination, which will represent a technology-based approach for controlling nitrogen, the NRE must evaluate treatment alternatives for meeting the lower limit of technology for nitrogen removal both year-round and seasonally. | Requiring plants to assess treatment strategies for reducing annual average TIN to concentrations of 3 mg/L is unreasonable. WQBEL should be the driver for assessing advanced treatment capabilities for each system. Requiring this type of an assessment at this point is unreasonable and will result in stranded time and money. | Reasonable Requirements/assessments |

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| Economic Evaluation (pg. 50) | As with AKART determination, this treatment assessment must include an economic evaluation.<br><br>Permittees need to indicate how allocations of direct costs for operation and capital expenditures are recovered from payment of utility fees, how often the rate structure is reviewed to ensure financial solvency, and the last time wastewater rates were either increased or decreased and the impetus for that change. | WQBELs should drive the regulatory limits that will be establish on future reissuances of the PSNGP, not TBELs based on economic availability of funds based on rate structure. Blending these strategies will be problematic and could lead to inconsistencies in regulatory approach for each utility. | Reasonable Requirements/assessments |

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<tr><th colspan="4">Draft Fact Sheet – Pierce County Sewer Division Comments<br>August 16, 2021</th></tr>
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<tr><td></td><td>The table below should list all of the required reports/report components that the permittee is expected to submit and the due dates for each<br><br>SUMMARY OF PERMIT REPORT SUBMITTALS<br>Refer to the Special and General Conditions within this permit for additional submittal requirements. Appendix A provides a list of definitions. Appendix B provides a list of acronyms.<br>Table 1. Summary of Permit Report Submittals<br><table><tr><th>Permit Section</th><th>Submittal</th><th>Frequency</th><th>First Submittal Date</th></tr><tr><td>S2.A.1</td><td>Permit Application (Notice of Intent)</td><td>Once</td><td>For new Permittees: No later than 90 days following permit issuance</td></tr><tr><td>G9</td><td>Transfer of Coverage</td><td>As necessary</td><td>As necessary</td></tr><tr><td>S9.A</td><td>Discharge Monitoring Reports (DMRs)</td><td>Monthly</td><td>Within 28 days of applicable monitoring period</td></tr><tr><td>G2</td><td>Notice of Change in Authorization</td><td>As necessary</td><td>As necessary</td></tr><tr><td>G6</td><td>Permit Application for Substantive Changes to the Discharge</td><td>As necessary</td><td>As necessary</td></tr><tr><td>G8</td><td>Application for Permit Renewal</td><td>1/permit cycle</td><td>No later than 180 days before expiration</td></tr><tr><td>G20</td><td>Notice of Planned Changes</td><td>As necessary</td><td>As necessary</td></tr><tr><td>G22</td><td>Reporting Anticipated Non-Compliance</td><td>As necessary</td><td>As necessary</td></tr></table></td><td>Include report submittals and due dates in table 1<br><br>Optimization Selection – Due May 1, 2022<br><br>Nutrient Optimization Plan – Due March 31, 2023<br>Annual Report – Due March 31, 2023<br>Load Evaluation<br>Strategy Assessment<br>Influent Nitrogen Reduction Measures/Source Control<br><br>Nutrient Reduction Evaluation – Due December 31, 2025<br>AKART Analysis<br>Engineering Report Identifying Treatment Plant Upgrades to meet 3 mg/L TIN<br>Annually and Seasonally?<br>Wastewater Characterization<br>Technology Analysis<br>Economic Evaluation<br>Environmental Justice Review<br>Technology Selection (to meet 3 mg/L TIN)<br>Viable Implementation Timelines</td><td>The requirement to meet a TIN of 3 mg/L annually is virtually impossible. The biological process is highly dependent on temperature.</td></tr>
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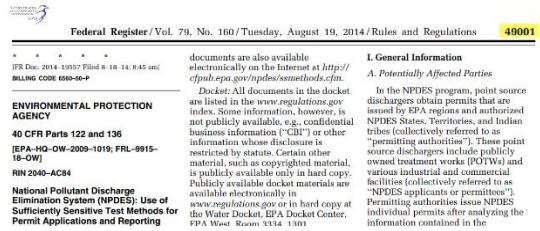
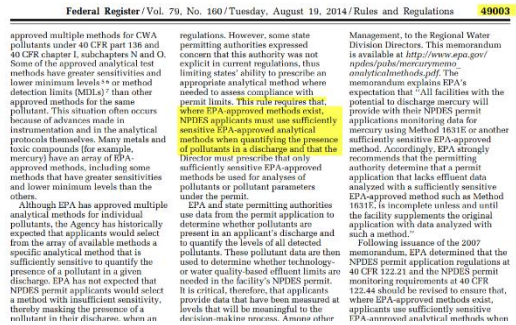
| Page 55 | ANALYTICAL METHODS AND QUANTITATION LEVELS<br>Federal Register 49001 "Use of Sufficiently Sensitive Test methods for Permit application and Reporting Rule" is cited to be the justification for mandating "... that when an EPA-approved method exists, the most sensitive method must be used when quantifying the pollutant in a discharge..." | 1. This mandate doesn't exist in Federal Register 49001<br>  <br>Federal Register / Vol. 79, No. 160 / Tuesday, August 19, 2014 / Rules and Regulations 49001<br>[FR Doc. 2014-19557 Filed 8-18-14; 8:45 am]<br>BILLING CODE 6560-50-P<br>ENVIRONMENTAL PROTECTION AGENCY<br>40 CFR Parts 122 and 136<br>[EPA–HQ–OW–2009–1019; FRL–9915–18–OW]<br>RIN 2040–AC84<br>National Pollutant Discharge Elimination System (NPDES): Use of Sufficiently Sensitive Test Methods for Permit Applications and Reporting<br>documents are also available electronically on the Internet at http://cfpub.epa.gov/npdes/ssmethods.cfm.<br>*Docket:* All documents in the docket are listed in the *www.regulations.gov* index. Some information, however, is not publicly available, e.g., confidential business information ("CBI") or other information whose disclosure is restricted by statute. Certain other material, such as copyrighted material, is publicly available only in hard copy. Publicly available docket materials are available electronically in *www.regulations.gov* or in hard copy at the Water Docket, EPA Docket Center, EPA West, Room 3334, 1301<br>I. General Information<br>*A. Potentially Affected Parties*<br>In the NPDES program, point source dischargers obtain permits that are issued by EPA regions and authorized NPDES States, Territories, and Indian tribes (collectively referred to as "permitting authorities"). These point source dischargers include publicly owned treatment works (POTWs) and various industrial and commercial facilities (collectively referred to as "NPDES applicants or permittees"). Permitting authorities issue NPDES individual permits after analyzing the information contained in the<br>2. The original language is in Federal Register 49003 with regard to analytical methods, "This rule requires that, where EPA-approved methods exist, NPDES applicants must use sufficiently sensitive EPA-approved analytical methods when quantifying the presence of pollutants in a discharge"<br>  <br>Federal Register / Vol. 79, No. 160 / Tuesday, August 19, 2014 / Rules and Regulations 49003<br>approved multiple methods for CWA pollutants under 40 CFR part 136 and 40 CFR chapter I, subchapters N and O. Some of the approved analytical test methods have greater sensitivities and lower minimum levels [5] or method detection limits (MDLs) [6] than other approved methods for the same pollutant. This situation often occurs because of advances made in instrumentation and in the analytical protocols themselves. Many metals and toxic compounds (for example, mercury) have an array of EPA-approved methods, including some methods that have greater sensitivities and lower minimum levels than the others.<br>Although EPA has approved multiple analytical methods for individual pollutants, the Agency has historically expected that applicants would select from the array of available methods a specific analytical method that is sufficiently sensitive to quantify the presence of a pollutant in a given discharge. EPA has not expected that NPDES permit applicants would select a method with insufficient sensitivity, thereby masking the presence of a pollutant in their discharge, when an<br>regulations. However, some state permitting authorities expressed concern that this authority was not explicit in current regulations, thus limiting states' ability to prescribe an appropriate analytical method where needed to assess compliance with permit limits. This rule requires that, where EPA-approved methods exist, NPDES applicants must use sufficiently sensitive EPA-approved analytical methods when quantifying the presence of pollutants in a discharge and that the Director must prescribe that only sufficiently sensitive EPA-approved methods be used for analyses of pollutants or pollutant parameters under the permit.<br>EPA and state permitting authorities use data from the permit application to determine whether pollutants are present in an applicant's discharge and to quantify the levels of all detected pollutants. These pollutant data are then used to determine whether technology- or water quality-based effluent limits are needed in the facility's NPDES permit. It is critical, therefore, that applicants provide data that have been measured at levels that will be meaningful to the decision-making process. Among other<br>Management, to the Regional Water Division Directors. This memorandum is available at *http://www.epa.gov/npdes/pubs/mercurymemo_analyticalmethods.pdf*. The memorandum explains EPA's expectation that "All facilities with the potential to discharge mercury will provide with their NPDES permit applications monitoring data for mercury using Method 1631E or another sufficiently sensitive EPA-approved method. Accordingly, EPA strongly recommends that the permitting authority determine that a permit application that lacks effluent data analyzed with a sufficiently sensitive EPA-approved method such as Method 1631E, is incomplete unless and until the facility supplements the original application with data analyzed with such a method."<br>Following issuance of the 2007 memorandum, EPA determined that the NPDES permit application regulations at 40 CFR 122.21 and the NPDES permit monitoring requirements at 40 CFR 122.44 should be revised to ensure that, where EPA-approved methods exist, applicants use sufficiently sensitive EPA-approved analytical methods when<br>Suggested Modification:<br>Adopt "...sufficiently sensitive EPA-approved analytical methods..." as the rule intended, not mandating "..the most sensitive method..' | Interpret and apply federal rules correctly |