

LONG TERM MANAGEMENT STRATEGY

November 20, 2012

Mr. Bob Stearns
Vice President, Client Services
Calscience Environmental Laboratories, Inc.
7440 Lincoln Way
Garden Grove, CA 92841-1427

Dear Mr. Stearns:

As you know, the Dredged Material Management Office (DMMO) recommends method 8082 (GC-ECD) for analyzing polychlorinated biphenyl (PCB) congeners in sediments. This method achieves reasonably low reporting limits, balanced against the much higher analytic costs of method 1668A. Recently, Calscience Environmental Laboratories, Inc. (Calscience) proposed using method 8270 (SIM), based on the view that your modifications to the method can allow it to achieve low reporting limits similar to those of method 8082 (GC-ECD). On that basis, the DMMO recommended Calscience conduct a side-by-side performance test comparing the two methods, via analysis of a custom set of certified standards. The standards included a "blind" mix of 20 separate PCB congeners at low concentrations (between 0.5 and 5 ug/kg each) prepared by an independent certifying lab. Calscience has now completed its performance test and has provided the results to the U.S. Environmental Protection Agency and the San Francisco Bay Regional Water Quality Control Board.

We have reviewed the performance test results, and agree that Calscience achieved similar results with both your 8270 (SIM) method and the 8082 (GC-ECD) method. In each case the results were well within typical acceptance limits compared to the certified standard values. Specifically:

- * Both methods accurately identified which 20 congeners were present.
- * Both methods achieved a reported detection limit of 0.5 ug/kg (ppb) per congener.
- * Both methods generally slightly under-estimated the certified value (17 of 30 congeners for 8082 and 20 of 20 congeners for 8270). However, the average recovery for all 20 congeners was good (86.54% for 8082 and 83.59% for 8270).

Based on these results, the DMMO hereby approves Calscience's use of your version of method 8270 (SIM) for PCB congener analyses in sediments, in addition to the DMMO-recommended method 8082 (GC-ECD).

U.S. Environmental Protection
Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

San Francisco Bay Conservation
and Development Commission
50 California Street, Suite 2600
San Francisco, CA 94111

U.S. Army Corps of Engineers
South Pacific Division
San Francisco District
1455 Market Street
San Francisco, CA 94103-1398

San Francisco Bay Regional
Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Please note that this approval applies only to Calscience and its customized version of method 8270 (SIM) at this time. Any proposal to use other methods or new modifications to the approved method should be discussed with the DMMO in advance. Calscience may be required to conduct a similar blind performance test to establish that results are effectively equivalent to method 8082 (GC-ECD).

If you have any questions regarding this issue, please contact me by e-mail or at the telephone number below.

Regards,



Robert J. Lawrence
Chair, Dredged Material Management Office
US Army Corps of Engineers
1455 Market Street, 16th Floor
San Francisco, CA 94103-1398
Telephone: (415) 503-6808

Copies Furnished:

Larry Lem, Calscience, Garden Grove, CA
Linda Scharpenberg, Calscience, Garden Grove, CA
US EPA, San Francisco, CA, Attn: Melissa Scianni, Brian Ross
CA BCDC, San Francisco, CA, Attn: Brenda Goeden
CA RWQCB, Oakland, CA, Attn: Beth Christian
CA SLC, Sacramento, CA, Attn: Donn Oetzel
CA F&G, Eureka, CA, Attn: Vicki Frey
CA F&G, Stockton, CA, Attn: Jim Starr
US NMFS, Santa Rosa, CA, Attn: Joe Dillon
US FWS, Sacramento, CA, Attn: Ryan Olah
US FWS, SF Bay-Delta Office, Sacramento, CA, Attn: Maral Kasparian