



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Total Toxic Organics (TTO) Laboratory Requirements for IUs subject to 40 CFR 413 and 40 CFR 433:

Laboratories must achieve an MDL for all required TTO pollutants of < 10 µg/L for NPDES reporting purposes.

All pollutants, except the ones listed below have a minimum detection limit of < 10 µg/L:

Pollutant	CAS	Notes
2,4-Dinitrophenol	51-28-5	MDL>10 µg/L for Methods 604 and 625
2-Methyl-4,6-dinitrophenol	534-52-1	MDL>10 µg/L for Methods 604 and 625
Trichlorofluoromethane	75-69-4	No MDL is listed for Method 601 or 624
PCB-1016	12674-11-2	No MDL listed for Method 608
PCB-1221	1104-28-2	No MDL listed for Method 608
PCB-1232	11141-16-5	No MDL listed for Method 608
PCB-1248	12672-29-6	No MDL listed for Method 608
PCB-1254	11097-69-1	No MDL listed for Method 608
PCB-1260	11096-82-5	No MDL listed for Method 608

A list of all approved methods for TTO pollutants can be found here:

<https://www.epa.gov/cwa-methods/approved-cwa-test-methods-organic-compounds>.

Solutions for Analytical Chemistry Problems with Clean Water Act can be found here:

https://www.epa.gov/sites/default/files/2015-08/documents/solutions-analytical-chemistry-problems-cwa-methods_epa_2007_rev_bkmk.pdf.

If laboratories are unable to meet these MDLs using an approved method found at 40 CFR 136, they must perform the analysis again after using appropriate clean up techniques. Laboratories must document that these clean up techniques were performed. Laboratories must document that samples were reanalyzed. If clean up technique is documented and reanalysis is documented, IDEM may use their best judgment in accepting the results for NPDES reporting purposes.

If laboratories are unable to meet MDLs for QA/QC after using their maximum effort, all data results should be flagged appropriately.

