



# Minnesota Pollution Control Agency

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November 2, 2011

RE: Guidance for Comparability Studies for Ammonia (as N)

Dear Wastewater Facilities and Interested Laboratories:

The Minnesota Pollution Control Agency (MPCA) is the agency that is charged with the duties to administer and enforce all laws relating to the pollution of any waters of the state. The MPCA has also been given the authority to establish and implement the participation by the state in the national pollutant elimination system (NPDES). These duties and authority are described in Minn. Stat. § 115.03, subd. 1(a) and 5 [<https://www.revisor.mn.gov/statutes/?id=115.03>].

The MPCA has been asked to provide guidance for the manual distillation step in the ammonia analysis for compliance monitoring under the Clean Water Act. Per 40 CFR § 136.3, Table 1B indicates that a manual distillation step is required prior to the analysis step. However, footnote 6 states, "Manual distillation is not required if comparability data on representative effluent samples are on file to show that this preliminary distillation step is not necessary; however, manual distillation will be required to resolve any controversies." Both the MPCA and the US Environmental Protection Agency (EPA), Region 5, agree that once the comparability study has been performed (and nothing else has changed from the previous permit), a repeat distillation study is not required at permit renewal. The MPCA will discuss the issue with the Minnesota Department of Health's (MDH) Environmental Laboratory Accreditation Program and make them aware of the guidance provided by the EPA and the MPCA on this issue. We will ask that the instruction sheet for the ammonia distillation form created by MDH (and revised on December 12, 2007) be updated to reflect our guidance and re-posted on MDH's webpage. If you have any questions or comments, please contact Bill Scruton at 651/757-2710 or via e-mail at [bill.scruton@state.mn.us](mailto:bill.scruton@state.mn.us).

Sincerely,

A handwritten signature in black ink that reads "Bill Scruton".

Bill Scruton  
Research Scientist II  
Performance Management and Quality Section  
Environmental Analysis and Outcomes Division

BS:jab