

Attendance (21)

- 7 Council Members (5): Paul Junio (Chair), Jennifer Buchholz (Vice Chair), Brenda Anderson, Craig Obry, Christine LesCamela (absent), Matt Schmeichel (absent), Tad Schwartzhoff
- 7 DNR Staff (5): Steve Geis, Tom Trainor, Autumn Farrell, Patty Doerflinger, Janelle Nehs (absent), Zana Sijan, Brandy Baker-Muhich (absent)
- Guests (11): Sharon Mertens (Milw MSD), Alfredo Sotomayor (Milw MSD), RT Krueger (NLS), Steven Hefter (NLS), Brooke Klingbeil (WRWA), Camille Danielson (WSLH), Erin Mani (WSLH), Amanda Kordus (Badger), Jessica McCammon (Madison MSD), Julie Klimek (Davy), Alex Zenner (Medford)

Agenda repair and approval of last meeting minutes

- Agenda repair: None.
- The last meeting minutes were approved.

Outstanding issues from last meeting

- The Lab Cert website has been updated to include checklists for TSS, BOD, total phosphorus, ammonia, general NR 149 requirements for registered labs, and one for compliance with the new MDL procedure. They can be found at the bottom of the documents page. Thanks to Paul for his feedback on these.

Program metrics report

Large-scale lab metrics: July 2023 – October 2023 (FY 2024 partial)

- To date completed: Audited = 108%, Reports Issued = 83%, Closed = 108%, Revised Application Audits = 8.
- Backlog of labs = 2.
- Reports issued within 60 days = 100%.
- Audits not closed over 1 year from report date = 1.
- Active labs = 112.
- New labs applied to program since last meeting = 0.
- Labs dropped from program since the last meeting = 0.

Small-scale labs: July 2023 – October 2023 (FY 2024 partial)

- To date completed: Audited = 65%, Reports Issued = 78%, Closed = 70%, Revised Application Audits = 2.

Since the audits completed being only 65% is partially due to audit dates not coming due, Paul mentioned that we should consider moving some audits up in time to level out the workload. Tom mentioned that we do try to do that.

- Backlog of labs = 2.
- Reports issued within 30 days = 100%.
- Audits not closed over 1 year from report date = 0.
- Active labs = 212.
- New labs applied to program since last meeting = 0.
- Labs dropped from program since last meeting = 0.

Other business items

- Tom provided a first look at the FY25 proposed budget for the program. Notable changes were that the “Salary and Fringe” total is ~29k higher this year because of staff raises, and the “Supplies and Services” total is ~20k less because the program won’t need a contract auditor. RVUs were down 319. The resulting cost per RVU is proposed at \$80.50, which is a 5.2% (\$4.00) increase from the previous year. Alfredo said the increase is like inflation. Paul said that this is not a big increase when looking at overall operation costs. Alex said smaller labs don’t get accredited to make money, they get accredited for convenience and treatment process control.

- **Steve Geis Retirement.** Steve's last day is February 2, 2024.
- **DOA training for Council members.** There is an annual requirement (that the program was unaware of) for Council members to complete review of the following two modules: "Ethics for Public Officials" and "WI Public Records Law." Time to complete training is about 30 minutes.
- **Staffing the laboratory accreditation program.** Paul asked what options are available if the program is understaffed. Tom said that the program has funding authorized by Statute and NR 149 to fill positions that become vacant. If the program is unable to find interested candidates that have the required credentials, the program can use third party auditors. Alfredo noted that DNR hiring freezes can affect hiring.
- **EPA Drinking Water Program feedback.** When the program has questions on language that is unclear in a method, staff reach out to the EPA for guidance. The following is a summary of some of the latest topics discussed with the EPA.
 - **EPA Method 353.2:** All environmental and QC samples must be bracketed by passing CCVs.
 - **EPA Method 505:** A calibration standard at the following concentrations (ug/L) must be included in the initial calibrations: 1016 = 0.08, 1221 = 0.2, 1232 = 0.2, 1242 = 0.3, 1248 = 0.1, 1254 = 0.1, and 1260 = 0.2.

The concentration of 0.2 ug/L for 1221 and 1232 is due to the stoichiometry to meet the PCB MCL of 0.5 ug/L as decachlorobiphenyl. Alfredo asked if the calibration standard must be analyzed at the MDL. Tom said no. In this case, the EPA has indicated that these concentrations are LOQ's or PQL's (concentrations where quantitative results can be achieved.) Tom said that EPA Region 5 and Steve Elmore confirmed that the detection limits referenced in 40 CFR Part 141 and NR 809 are the concentrations that a lab needs to report those contaminants to, at a minimum – unless otherwise specifically noted in the rule (i.e., detection limit ≠ MDL). This means that laboratories do not have to report to their MDL (unless otherwise specifically noted in rule) if their LOQ meets the detection limit. The Department does not require reporting to the MDL for drinking water if the detection limits referenced in code are met by the LOQ (unless otherwise specifically noted in rule.) Of course, in all cases, the lab's MDL must be below the lab's LOQ. For laboratory convenience, Tom put together the following list from 40 CFR 141 and NR 809 for the minutes:

141.23 (a)(4)(i) "Detection Limits for Inorganic Contaminants" table. [\[NR 809.113 \(4\) Table C\]](#)
This table only applies to composite samples, so ignore it if not handling composite samples.

141.24 (f)(17)(i)(E). [\[NR 809.243 \(1\)\]](#)

An MDL of 0.5 ug/L must be achieved for all regulated VOCs, except for vinyl chloride which an MDL of 0.2 ug/L must be achieved. Results are to be reported to 0.5 ug/L or lower, except for vinyl chloride which must be reported to 0.2 ug/L or lower. If the LOQ is 0.2 ug/L for vinyl chloride and if the LOQ is 0.5 ug/L for all other regulated VOCs, there is no need to report to the MDL.

141.24 (h)(13). [\[NR 809.203 \(3\)\(a\)\]](#)

Aroclors must be reported to these detection limits or lower (ug/L): 1016 = 0.08, 1221 = 0.2, 1232 = 0.2, 1242 = 0.3, 1248 = 0.1, 1254 = 0.1, and 1260 = 0.2.

141.24 (h)(18). [\[NR 809.203 \(1\)\]](#)

Results are to be reported to the detection limits in this table or lower. If the LOQ meets these detection limits, there is no need to report to the MDL.

141.89 (a)(1)(ii)(A). [\[NR 809.541 \(4\)\(a\)1\]](#)

Results for lead must be reported to the MDL per 141.89 (a)(3) [\[NR 809.541 \(5\)\(a\)\]](#). An LOQ of 5 ug/L must be achieved for lead.

141.89 (a)(1)(ii)(B). [\[NR 809.541 \(4\)\(a\)2\]](#)

Results for copper must be reported to the MDL per 141.89 (a)(4) [\[NR 809.541 \(5\)\(b\)\]](#). An LOQ of 50 ug/L must be achieved for copper.

141.89 (a)(1)(iii). [\[NR 809.541 \(4\)\(b\)\]](#)

An MDL of 1 ug/L must be achieved for lead.

141.131 (b)(2)(iv). [NR 809.563 (4)(e) Table U]

A standard at 1 ug/L or lower must be in the calibration curve for each TTHM. A standard at 1 ug/L or lower must be in the calibration curve for each HAA5, except for monochloroacetic acid which must be at 2 ug/L or lower. A standard at 20 ug/L or lower must be in the calibration curve for chlorite. A standard at 1 ug/L or lower must be in the calibration curve for bromate (if using EPA 317.0, 321.8, or 326.0). Report results to the MRLs listed in this table. If the LOQ meets these limits, there is no need to report to the MDL.

- EPA Method 505: An initial calibration and MDL study must be performed for each Aroclor.
- EPA Method 525.2: SIM mode is not allowed. LC/MS/MS setup in triple quad mode is not allowed.
- EPA Method 525.3: LC/MS/MS setup in triple quad mode is not allowed.
- EPA Method 537.1: Extract concentration must be performed at 60-65 degrees Celsius.
- EPA Method 537.1: Extracts must be concentrated to complete dryness.
- EPA Method 548.1: Any anion exchange resin cartridge that is marketed as acceptable for Method 548.1 can be used if anion exchange is used and QC are met. Keep in mind that the same method extraction steps and QC criteria are required.
- SM 3113B: When analyzing for arsenic and selenium, hydrogen peroxide must be added to the samples as instructed by the method.

- **EPA Clean Water Program feedback.** When the program has questions on language that is unclear in a method, staff reach out to the EPA for guidance. The following is a summary of the latest topics discussed with the EPA.

- EPA Method 1664: The LCS and MS must pass; data qualifiers may not be used.

Paul said repeat analysis implies you have more sample to work with, which is often not the case. Paul also noted that the method required rounding rules are not able to be achieved with current LIMS systems. Sharon mentioned that taking a replacement sample will never be like the original.

There were additional questions sent to Lem Walker of the EPA that the program was waiting for a response on. The program will discuss them and share them with the group at the next council meeting.

- Alfredo asked what the program's position is on SM 5210B which requires averaging three GGA standards to determine QC compliance. Alfredo also asked if the program will be requiring a method blank as specified in SM 2540D. Tom said Lab Cert will discuss these issues and get back to everyone.
- Brooke asked what the program decided to do on the MS requirements listed in *Standard Methods* now for total phosphorus and ammonia analyses. Tom said that once these methods are incorporated into NR 219, the MSs will be required. Tom said Lab Cert will do some training between now and then and provide some guidance documents.
- Tom asked the group how EPA method 1633 was coming along. Paul said the EPA is very happy with the method and Sharon said the DOD is also. Paul and Sharon do not expect any significant changes to the method during the public comment period. As a result, it should be safe to move to the method once the method has been finalized for all matrices.

Council member issues

- Paul mentioned that his term expires next April so his position, demonstrated interest member, will be open. He also reminded us that council elections are at the next meeting.

Checkout and next meeting date

- The next meeting is scheduled for January 30, 2024, at 9 AM. An in-person meeting option at the WSLH is offered. It is expected that many of us will show up in-person this time as this will be Steve Geis's last meeting.