

Remote Attendance (18)

- 7 Council Members (5): Paul Junio (Chair), Jennifer Buchholz, Tad Schwartzhoff (absent), Brenda Anderson, Craig Obry (absent), Carol Mielke, Matt Schmeichel
- 7 DNR Staff (6): Steve Geis, Tom Trainor, Zana Sijan, Brandy Baker-Muhich, Janelle Nehs, Autumn Farrell (absent), Patty Doerflinger
- Guests (7): Sharon Mertens (Milw MSD), Alfredo Sotomayor (Milw MSD), RT Krueger (NLS), Steven Hefter (NLS), Brooke Klingbeil (Medford), Christine LesCamela (Sun Prairie), Julie Klimek (Davy)

Agenda repair and approval of last meeting minutes

- Agenda repair: None.
- Paul asked that “years” be changed to “year’s” in the second sentence of the first bullet under “Other Business Items.” With that revision, the last meeting minutes were approved.

Outstanding issues from last meeting

- At this time, the Water Quality Program (WQ) does not inform dischargers of the exact detection limits that need to be met for permit applications. This is because WQ does not have the resources available to deal with this workload. More importantly, WQ does not think it is necessary because the instances when they need to ask a discharger to resample and provide a lower detection limit are very rare. WQ indicated that the current practice of using EPA 624 and EPA 625 as the initial testing methods for permit applications is acceptable. Specific analyte class methods (604, 610, 612, ...) are not required as a first testing method for permit applications. At our request, WQ added a clarification statement to the permit application instructions indicating that laboratories do not know what detection limits the department requires. WQ did say that arsenic has been a frequent issue when the discharge is to a drinking water supply source such as Lake Michigan and Lake Superior. In those cases, the arsenic limit is 0.2 ug/L which will likely require an ICPMS analysis to meet this limit.
- Craig had asked at the last meeting if E.coli testing was going to be required for biosolids/sludge samples. WQ told Tom not at this time.

Program metrics report

Large-scale lab metrics: July 2021 – June 2022 (FY 2022 complete)

- Completed: Audited = 105%, Reports Issued = 118%, Closed = 95%, Applications = 10.
- Reports issued within 60 days = 83%.

Large-scale lab metrics: July 2022 – August 2022 (FY 2023 partial)

- Completed: Audited = 33%, Reports Issued = 33%, Closed = 50%, Applications = 1.
Note: Summer vacations and auditor checklist updates took place during July/August.
- Backlog of labs = 10.
- Reports issued within 60 days = 50%.
- Audits not closed over 1 year from report date = 2.
- 111 active labs.
- No new labs applied to program since last meeting.
- 1 lab dropped from program since the last meeting. This lab was a WET testing lab. This leaves us with two Superior, WI, WET testing labs as the only labs in our program that can perform WET testing for WPDES compliance samples.

Small-scale labs: July 2021 – June 2022 (FY 2022 complete)

- Completed: Audited = 96%, Reports Issued = 95%, Closed = 91%, Applications = 2.
- Reports issued within 30 days = 92%.

Small-scale labs: July 2022 – August 2022 (FY 2023 partial)

- Completed: Audited = 75%, Reports Issued = 100%, Closed = 50%, Applications = 0.
Note: Summer vacations and auditor checklist updates took place during July/August and no contract auditor in July.
- Backlog of labs = 33.
- Reports issued within 30 days = 58%.
- Audits not closed over 1 year from report date = 0.
- 216 active labs.
- No new labs applied to program since last meeting.
- 3 labs dropped from program since last meeting.

Other business items

- Tom presented the currently approved PT providers and the tests that require PTs. Paul said I can change the “Wibby” reference to “Phenova” as “Wibby” is a legacy reference. Tom indicated that this renewal year we did receive at least one PT from each one of the approved PT providers.
- During discussion of the July/August metrics, Carol asked if checklists could be posted on our website for labs to review before an audit. Tom said that the plan is to post BOD, TSS, pH, TP, and NH3-N checklists in the future. Lab Cert will publish checklists once we have them vetted. Alfredo said we could just include a disclaimer that the checklists are draft. Checklists are written for internal staff and some content may be confusing to the laboratories as the content on the checklists is not written as a simple list of potential deficiencies. As a result, in order to properly post checklists that are usable for laboratories, we would need to provide an edited version of our internal checklists, which again, is additional workload for which we do not have time. RT suggested that laboratories should have input into drafting these checklists. Tom said we will continue to work towards putting checklists on the website in the future, but it is a slow process. Paul indicated that NJ and FL have some nice checklists (among possibly other States) that we may want to review as a reference if we have time.
- Christine provided information on how Sun Prairie performs their E.coli and fecal testing. They use IDEXX Colilert 18 (Quanti-Tray) for E.coli and SM 2222D (membrane filtration) for fecal. Sun Prairie has determined that they obtain the best results by performing both analyses within 15 minutes of sample collection. Doing this removes different analysis times as a variable. Christine’s advice for laboratories is to have everything prepped for testing and ready to go before the sample is collected. Make sure sample temperature is 17-23 °C. From April through September, their average fecal numbers were typically around 10 and average E.coli around 13. Christine provided tips for using the Quanti-Tray method. Foam can be an issue, so Brooke highly recommended that laboratories look into using the IDEXX antifoam reagent. Christine feels that their results are repeatable, consistent, and reliable, and she said they will share SOPs and benchsheets with others and provide consulting help if anyone needs it. Alfredo asked the Program if anyone is considering certifying for this test. Tom said no to certification. At this time, proper testing performance of NR 219 exempted parameters falls on the WQ program - but there is discussion that Lab Cert may try to lend a helping hand in this. One idea we are considering is to create a checklist for everyone to use. Lab Cert, WQ, and DATCP would get together to create these. Alfredo suggested that we could also look at offering voluntary accreditation for these tests.
- Paul brought up for discussion the use of “EPA approved” labs as referenced in NR 809. He was wondering what that exactly meant as it isn’t defined anywhere in NR 809. Alfredo explained that the intent when this was written was to provide an option for the Drinking Water Program (DW) to use an EPA certified radiological testing lab and an EPA approved asbestos testing lab. Because this language exists now, DW is able to use laboratories approved under the UCMR5 program to perform WI compliance sample testing. RT said that UCMR5 labs go through a paper audit only and receive an approval letter. Tom indicated that since the language exists in NR 809, and since the department lawyers confirmed that the language in NR 809 allows DW to do this, there isn’t anything we can do. Tom indicated that sections NR 809.113, 809.203, 809.243, 809.311, 809.335, 809.541, 809.563, 809.61, 809.71, 809.73, 809.76, and 809.80 all offer laboratory compliance testing to entities outside of those certified under NR 149. Lab Cert will summarize these issues and discuss them with DW in order to improve the language in the next NR 809 update.
- Paul asked if the Lab Cert program could come up with guidance for stakeholders to use when required testing is not performed by a laboratory currently certified by the program (example: PCBs in drinking water.) Tom said Lab Cert will bring a proposal for review to the next council meeting. Alfredo interjected that we should be careful being too prescriptive on this issue as NR 149 affords us the opportunity for discretionary acceptance. Paul said he understands that but thinks it wouldn’t hurt to have a guidance “Plan B” in place.
- Carol indicated that she is retiring in January. As a result, we have an opening for a new large municipal WWTP member. Tom indicated that there are 27 municipalities with greater than 5 MGD design flow that would fit this position. The plan is for Tom to email all of them to let them know the position is open.

Program updates

- **Future Council meetings in-person option:** Tom indicated that moving forward, all future Council meetings will include a video/audio option for participation. Using teleconference technology saves the department time and money. No one, including Council members, will be required to be present for in-person meetings going forward. That being said, we will provide that option if people want to meet in person at the WSLH. Sharon suggested that maybe once a year (not in January), we should all make a concerted effort to meet in person.
- **EPA 533 certification in drinking water:** With the July 2022 update to NR 809, Tom asked if there were any objections to the Lab Cert program offering EPA method 533 certification. Based on NR 809, Paul said that we should be offering it. RT asked why a laboratory would choose to get this certification. Tom said there is no reason; it would just be a laboratory preference, as being certified for just EPA method 537.1 is sufficient. Tom asked if there were any objections to changing the minimum number of required PT analytes for PFAS group certification. Paul said as long as we can ensure that all PT providers spike the minimum number in all of their PTs then that is fine. Paul said we want to avoid requiring special WI PTs, and he would ideally like to see all target analytes required as passing.
- **WSLH PCB PT variance request:** The WSLH is asking for a variance to provide a soil PCB Aroclor PT instead of water PT. The WSLH does not utilize a water PCB extraction method, so it doesn't make any sense for them to perform a water PT. The soil PT will be a better match to their extraction method. Paul said that this makes sense. As there were no objections, the variance was granted.
- **Drinking water PFAS FAQ:** With the update to NR 809 this summer, the Lab Cert program has been asked to provide guidance to laboratories regarding specific issues around PFAS testing. A guidance in the form of frequently asked questions has been put together and will be emailed to all laboratories before October. Sharon asked if this guidance could be posted on the department's website. Tom said he would check with Drinking Water Program and see if he can find a logical place to put it on the Lab Cert website.
- **Surface water PFAS FAQ:** With the update to NR 105, NR 106, and NR 219 this summer, the Lab Cert program has been asked to provide guidance to laboratories regarding specific issues around PFAS testing. A guidance in the form of frequently asked questions (mirroring the drinking water guidance) will be put together and will be emailed to all laboratories before the end of this year. If you have any questions you feel need addressing, please forward those to Tom.
- **WWOA annual conference:** The October conference is in Green Bay this year and features three presentations from Lab Cert staff. There is an October 4, 1-4 pm, pre-conference BOD workshop, an October 6, 1:30-2:15 pm, lab basics presentation, and an October 6, 2:20-3:05 pm, frequent audit findings presentation. Paul asked that we provide copies of the slides of these presentations on our website.

Council member issues

- **DNR Laboratory of the Year Award:** Brooke asked if the program would consider allowing certified WPDES laboratories to be considered for this award. The work they do is important just like registered labs, and currently they are excluded from being eligible for this award. Paul was in support but RT not as much. As long as the laboratory does not use the award for marketing/promotional purposes, we all thought it would be ok. Alfredo asked why certified public water utilities would not be considered then. Same would go for public health labs. Jennifer mentioned that it is critical that they don't use it for marketing because that is unfair to commercial laboratories. Steve said the idea has merit and would like to discuss it in a task force setting in more detail. Volunteers for the task force so far include Steve, Tom, Patty, and Brooke.

Checkout and next meeting date

- Next meeting is scheduled for November 15, 2022, at 9 AM.