# General Quality System Requirements Checklist * <br> for BOD, TSS, Ammonia and Phosphorus REv. 11/17/23 

Based on NR 149 (2021)
Some questions may not be applicable to every lab. If applicable, all answers must be "yes" to be in compliance.
*This checklist was created for the aid of registered laboratories. It is only an internal audit guideline; it is not meant to be comprehensive of all regulatory requirements, to dictate DNR audit format, or to include all acceptable code options. Laboratories must comply with all applicable code and method requirements whether listed on this checklist or not. Additional method requirements are on separate checklists.

|  | Equipment | Y | N | Notes | Citation |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Are all thermometers unexpired (i.e., calibrated or verified annually or within the calibration due date on the certificate)? |  |  |  | NR 149.44 (3)(a), $(3)(\mathrm{d})(1)$ |
| 2 | If verifying thermometers, is the thermometer being verified compared to an NIST traceable, unexpired thermometer, or is the thermometer verified to ice-point and/or boiling point? |  |  |  | NR 149.44 (3)(a), $(3)(d)(1)$ |
| 3 | Is the temperature recorded daily (on work days) for the refrigerators (sample storage and chemical storage)? |  |  |  | NR 149.44 (3)(d)(4), NR 149.45 |
| 4 | Is the balance checked monthly with a class 2 or better weight? |  |  |  | NR 149.44 (3)(d)(3), (3)(d)(3)(b) |
| 5 | Has the class 2 or better weight been calibrated or verified within 5 years of the weight certificate calibration date? |  |  |  | $\begin{aligned} & \text { NR } 149.44 \\ & (3)(\mathrm{d})(3)(\mathrm{b}) \end{aligned}$ |
| 6 | If using mechanical pipettes, are they calibrated or verified every quarter? |  |  |  | NR 149.44 (3)(d)(2) |
| 7 | Are there tolerances or criteria for balance verifications and pipette verifications? |  |  |  | NR 149.44 (3)(c)(3) |


|  | Corrective Actions | Y | $\mathbf{N}$ | Notes | Citation |
| :--- | :--- | :--- | :--- | :--- | :---: |
| 8 | When QC limits are exceeded, is corrective action taken <br> and followed up on? |  |  | NR 149.38 (1) |  |
| 9 | Is corrective action taken when there are any other <br> instances of departures from quality systems (e.g., <br> temperatures exceeded, hold time exceedances, PT <br> failures, etc.)? |  |  |  | NR 149.38 (1) |
| 10 | Are all of the following documented for corrective action: <br> the problem, most probable cause, what was done to fix <br> the problem, and verification that the problem was <br> solved? |  |  | NR 149.38 (2), (3) |  |
| 11 | Does corrective action include qualification of data on test <br> reports and the DMR? |  |  | NR 149.47 (5) |  |


|  | Records and Documents | $\mathbf{Y}$ | $\mathbf{N}$ | Notes | Citation |
| :--- | :--- | :--- | :--- | :--- | :---: |
| 12 | Are all lab records available (including thermometer <br> records, weight certificates, raw data, etc.) for the last 3 <br> years? |  |  |  | NR 149.39 (1)(c) |
| 13 | Are records kept in secure manner, recorded in ink, and <br> electronic records backed up? |  |  | NR 149.39 (1)(f), <br> $(1)(\mathrm{g})$ |  |
| 14 | Are all referenced methods available? |  |  |  | NR 149.39 (2)(d) |


| 15 | Are all methods currently approved? (see NR 219 Table B or 40 CFR Part 136) |  |  | NR 149.41 (1) |
| :---: | :---: | :---: | :---: | :---: |
| 16 | Are SOPs documenting all methods and lab procedures available, up to date, and followed? |  |  | NR 149.40 (1) |
| 17 | Do written SOPs include all of the required elements: <br> - Referenced method <br> - Potential interferences and how to treat <br> - Equipment and instruments <br> - Supplies and chemicals <br> - Sample preservation, storage, and hold time <br> - QC and frequency <br> - Calibration and standardization <br> - Procedure <br> - Acceptance criteria for QC <br> - Corrective actions and contingencies <br> - Date of issue or revision |  |  | NR 149.40 (4), (5) |
| 18 | Is the quality manual available, up-to-date, and followed? |  |  | NR 149.37 (1) |
| 19 | Unless included in other SOPs, does the quality manual include all of the required elements: <br> - Procedures for retention, control, and maintenance of documents <br> - Procedures for achieving traceability of chemicals and reference materials <br> - Procedures for handling samples <br> - Procedures for calibration, verification, and maintenance of support equipment <br> - Procedures for evaluating QC samples <br> - Procedures for initiating, following up on, and documenting corrective action <br> - Date of issue or revision |  |  | NR 149.37 (3), (4) |
| 20 | Is there a procedure for the maintenance of analytical instruments? |  |  | NR 149.44 (4)(b) |
| 21 | Is there a written policy stating what is required for the initial demonstration of capability (IDC) including criteria? |  |  | NR 149.36 (2)(b) |
| 22 | Are IDC records kept for each analyst and each parameter, and do they it meet the lab's (or method) IDC criteria? |  |  | NR 149.36 (2)(b) |
| 23 | For all purchased chemicals, are the dates of expiration (when provided), lot numbers, vendors, chemical names, and concentrations documented? |  |  | NR 149.39 (3)(b) |
| 24 | For all prepared chemicals, are the preparer, dates of preparation, dates of expirations, links to the stocks, and preparation details documented? |  |  | NR 149.39 (3)(c) |
| 25 | When lab staff collect samples, is the sampling start date and time and collection date and time documented, along with the person who performed the sampling? |  |  | $\underset{\text { Permit }}{\text { NR 149.45; WPDES }}$ |


|  | MDLs (only applicable to total phosphorus and ammonia analyses) <br> This section only lists the most frequent MDL issues. See the separate checklist or EPA procedure for additional MDL requirements. The department considers the MDL to be equivalent to the LOD. | Y | N | Notes | Citation |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 26 | Do all of the MDL spiked blanks and method blanks go through all steps of the method? |  |  |  | NR 149.48 (2)(b); 40 CFR Part 136 Appendix B (1)(1) |
| 27 | Is the initial MDL only performed for new methods, if there was a significant change, or if the lab believes the sensitivity has changed significantly (i.e., an "initial" MDL isn't done every year)? |  |  |  | $\begin{aligned} & \text { NR } 149.48(2)(\mathrm{f}) ; 40 \\ & \text { CFR Part } 136 \\ & \text { Appendix B (II)(2), } \\ & \text { (II)(3)(d), (II)(4)(b) } \end{aligned}$ |
| 28 | Is the MDL recalculated at least every 13 months? |  |  |  | $\begin{array}{\|c\|} \hline \text { NR } 149.48(2)(\mathrm{b}) ; 40 \\ \text { CFR Part 136 } \\ \text { Appendix B (II)(4)(a) } \\ \hline \end{array}$ |
| 29 | For the ongoing MDL, were at least 2 blank spikes run in separate batches each quarter? |  |  |  | 40 CFR Part 136 Appendix B (II)(3)(a) |
| 30 | For the ongoing MDL, were all spiked blanks from the last 2 years (no more, no less) used in the $\mathrm{MDL}_{\text {s }}$ determination, including the initial MDL data if within 2 years of the recalculation date? |  |  |  | 40 CFR Part 136 Appendix B (II)(4)(b), (II)(4)(c) |
| 31 | Were all method blanks from the last 2 years used in the $\mathrm{MDL}_{\mathrm{b}}$ determination (or were the last six months or last 50 method blanks used, whichever of these two options yielded more data)? |  |  |  | 40 CFR Part 136 Appendix B (II)(4)(e) |
| 32 | Are negative results included in the $\mathrm{MDL}_{\mathrm{b}}$ determination? |  |  |  | 40 CFR Part 136 Appendix B (II)(2)(d)(iii)(A) |
| 33 | Is the MDL set to the greater of the MDL ${ }_{\text {s }}$ or MDL ${ }_{\text {b }}$ ? |  |  |  | 40 CFR Part 136 Appendix B (II)(4)(f) |
| 34 | If the new, recalculated MDL is not within 0.5-2 times the existing MDL or $\geq 3 \%$ of the method blanks were above the existing MDL, was the MDL set to the newly determined MDL? |  |  |  | 40 CFR Part 136 Appendix B (II)(4)(f) |
| 35 | Is the MDL below permit or regulatory limits? (if not, contact Lab Cert staff) |  |  |  | NR 149.48 (2)(c) |
| 36 | Are all reported MDLs adjusted for any dilution (i.e., adjust when the sample amounts used are different than those used for the MDL determination)? |  |  |  | NR 149.48 (2)(d) |
|  |  |  |  |  |  |
|  | Miscellaneous | Y | N | Notes | Citation |
| 37 | Are all reagent containers labeled with the expiration date, chemical name, and concentration? |  |  |  | NR 149.39 (3)(a) |
| 38 | Are samples stored separately from all standards, reagents, food, and other potentially contaminating sources? |  |  |  | NR 149.442 (4)(c) |
| 39 | Are expired chemicals not used for analysis? |  |  |  | NR 149.39 (3)(d) |
| 40 | If the lab is paid to do any compliance testing that requires certification (e.g., BOD, TSS, ammonia, phosphorus), is the lab certified (not registered)? |  |  |  | NR 149.03 (21), (63), NR 149.05 (1) NR 149.13 (1) |
| 41 | If the lab performs testing for pretreatment samples, are approved methods used and NR 211 and NR 149 code requirements met? |  |  |  | NR 149.02 (5), NR 149.05 (1) |


|  | Requirements for Certified Labs ONLY (lab that performs testing for other facilities) | Y | N | Notes | Citation |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 42 | Is a written sample acceptance policy available that clearly outlines the conditions under which samples will be accepted, rejected, or reported with qualifiers? |  |  |  | NR 149.442 (1)(a) |
| 43 | Are all of the following documented upon sample receipt: <br> - Identity of client <br> - Collection date <br> - Collection time (for BOD) <br> - Unique sample ID <br> - Link between lab's sample ID and client's sample ID <br> - Requested analyses <br> - pH verification (for NH 3 and phosphorus) <br> - Sample/cooler temperature |  |  |  | NR 149.442 (3) |
| 44 | If analyzing BOD for other facilities, are those samples seeded, or is documentation maintained that the facility does not perform disinfection on the samples? |  |  |  | NR 149.50 (1)(g) |
| 45 | Is there a written agreement with the client(s) on file or does the lab report all of the required NR 149 elements in the reports to the client? <br> Required elements: <br> - Name of the lab <br> - Lab's FID <br> - Sample ID provided by the client <br> - Methods used <br> - Collection date <br> - Collection and analysis times for BOD <br> - Indication if non-aqueous samples are reported on dry weight or wet weight basis <br> - LODs and LOQs <br> - Indication that LODs and LOQ were adjusted for dilutions <br> - Units of measurement <br> - Date of test report <br> - Any qualifiers (needed even if have a client agreement) <br> - ID of any subcontracted results |  |  |  | $\text { NR } 149.47 \text { (2)(b), }$ (2)(d) |


| Documentation and Records - Are all of the following <br> documents or records available, if applicable? | $\mathbf{Y}$ | $\mathbf{N}$ | Notes | Citation |  |
| :---: | :--- | :--- | :--- | :--- | :---: |
| 46 | Sample collection date, time, and sample collector |  |  |  | NR 149.45; WPDES <br> Permit |
| 47 | Thermometer certificates or records of <br> calibration/verification |  |  | NR 149.45 |  |
| 48 | Equipment (samplers, refrigerators, incubators, ovens, <br> furnaces, digestion blocks) temperatures |  |  |  | NR 149.45 |
| 49 | Balance checks |  |  |  | NR 149.45 |
| 50 | Balance weight certificates |  |  |  | NR 149.45 |
| 51 | Mechanical pipette verifications |  |  |  | NR 149.45 |
| 52 | LOD/MDL determination (analytical method, units, matrix, <br> rationale for removal of outliers, dates of prep (e.g., <br> distillation, digestion), dates of analysis, and MDL <br> calculation date) |  |  | NR 149.45; 40 CFR <br> Part 136 Alpendix <br> B (III) |  |



| WI DNR Resources |
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| DNR Website (which includes the resources below): Laboratory Certification IWisconsin DNR |
| Example quality manual template |
| Example pH SOP template |
| Example total residual chlorine SOP template |
| Example E.coli SOP template |
| LOD/MDL benchsheets and instructions |
| Example auto-pipette quarterly verification log |
| Example thermometer annual verification log |
| Example analytical balance monthly verification log |
| Example daily equipment temperature measurements log |
| Example equipment maintenance log |
| Example sample collection log |
| Example initial demonstration of capability log |
| Example prepared and purchased chemical tracking logs |
| Example general corrective action log |
| Lab activity reminder checklist |
| Lab Accreditation Program staff - contact any staff with questions or concerns, especially if there are ongoing QC issues |

