



LABNOTES

The Newsletter of the Wisconsin Laboratory Certification and Registration Program



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NR 149: 1st Anniversary

Tempus fugit is Latin for “time flees”, which the world has morphed into “time flies”; and how quickly time does fly.

Since the revisions to NR 149, fully 134 of you laboratories out there have already been audited under the new requirements. That means you've likely gotten up close and personal with NR149. You may have your Quality Manuals to guide you, but we rely on NR 149.

Trying on a new set of rules is not wholly unlike trying on a new pair of pants. They looked right in the store, and may have even felt OK if you bothered to head for a dressing room to actually try them on. Of course, some of you just buy by looks, color, and essential measurements, without ever bothering to try them on. Until you get home, that is.

You know what we're talking about don't you? Especially with jeans. They just don't feel comfortable, like your old jeans with the gaping holes at the knees. They need time to be worn in.

That's the way it is with the new NR149; we've had a year-long “shake-down cruise” of sorts to try it on for size and get it worn in.

Is it perfect? Nope. But we knew that. An administrative rule for something as technically intense as laboratory analysis is really a dynamic entity. Technology changes and our rule needs to change with it.



We know some of you out there, especially those closest to it, are clamoring to re-open the rule and fine-tune it. And that will happen—in good time. We need to ensure we know what adjustments are needed to make it feel right. Like a fine beer, NR 149 needs a little krausening.

Everything You Always Wanted To Know About PTs *

* ...and some things you didn't even know you didn't know!

The accreditation renewal period which ended on September 1, 2009 was the first in which the relationship between new accreditation structure and PT results was put to the test.

We learned that that we all have some corrective measures to implement in order to ensure a smoother renewal next

spring. **Consequently, we've decided to dedicate the majority of this issue to the details of PT requirements.** The program is making some changes for next year and labs have some work to do to be ready.



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Laboratory Certification
Program

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EPA IDs: Get one. Use it.

At an early age we all learned that we are identified by our social security number. In the world of proficiency testing, the identifier is the "EPA ID".

Yes, your 9-digit WDNR LabCert ID identifies you, but each state has its own ID system. PT providers need a singular means of identifying labs and that means is the EPA ID.

For providers other than the State Lab of Hygiene, if you do not submit an EPA ID with your PT results, your results will end up in the electronic home for wayward PT results. We use your EPA ID, as uploaded by the PT provider with your

data, to identify your Wisconsin DNR LabCert ID and then successfully load your PT results. So if you don't have one, get one. Once you have one, report it with all PT results. ***If you have more than one EPA ID, make sure we are aware of them.*** We also had cases where PT results ended up in the electronic PT wasteland because labs had (*and used!*) multiple EPA IDs and of which we were not aware

You can obtain an "EPA lab ID" by contacting Charles Feldman with the EPA Office of Ground Water and Drinking Water at (513) 569-7671.

We Don't Do Solid PTs

The program has opted not to allow use of solid or hazardous waste PTs for certification or registration in the solids matrix. The concentration ranges tend to be somewhat high and the acceptance criteria for some analytes are quite lenient, when compared to the WP.

Solids PTs routinely cost double or more than the corresponding WP and their analysis really only demonstrates the effectiveness of the digestion, distillation or extraction. Since WP PTs demonstrate laboratory capability at lower concentrations, they are more likely to indicate laboratory quality. Finally, PTs

are a significant expense for all laboratories, this will help to keep costs down.

Successful results for an analyte-technology combination on a "WP" will satisfy PT requirements for both the aqueous and solid matrix.



WS PTs are valid only for Drinking Water

In a nutshell, WS PTs count only for drinking water, even though many analytes are the same as in WP PTs.

Drinking water analysis has always required submittal of an acceptable **Water Supply (WS)** PT sample. Since 2005, drinking water certification has been by method/analyte (or VOC analyte group) and laboratories have been required to submit acceptable PTs for each

method/analyte combination.

Laboratories that are certified or registered in the either the aqueous or solids matrix must submit acceptable PTs from a **Water Pollution (WP)** study. If a laboratory maintains the same analytical technology/analyte or analyte group certification in both matrices, only a single PT result is required.

Report [Appropriate] Method Codes for PT results

As EPA IDs are required to identify which lab “belongs” to a particular set of PT results, so “method codes” are used to identify the particular analytical technology used to generate a set of PT results.

If we can't identify which technology was used to report PT results, how would we know which combination of analyte-technology to credit with acceptable PT results?

For example, we receive acceptable PT results for ACME labs for ammonia nitrogen, with no method description or method code selected. ACME Labs is registered to perform ammonia by ion-selective electrode. Sure, it may seem appropriate to credit ACME with an acceptable PT for ammonia by ISE, but how can we be sure that this is really how the PT was analyzed?

The issue becomes further clouded when we consider a class of analytes like

metals. A PT result for lead (Pb) could have been analyzed by flame AA, graphite furnace AA, ICP, or ICP/MS. If ACME labs happened to be certified for all of these technologies, which one gets “credited”? And, if the lab actually uses flame AA for the PT, flame AA is specifically exempted from PT requirements!

Most PT providers offer either a “look-up” function (for on-line reporting of PT results) or a list of available method codes. Make sure that you are reporting a method code with your PT results, and that the method code you report is appropriate for your accreditation(s).

The consequences are that you run the risk of not having one or more accreditations renewed annually, resulting in a potential lapse in accreditation.

“If we can't identify which technology was used to report PT results, how would we know which combination of analyte-technology to credit with acceptable PT results?”

Proficiency

Definition

Mastery of a specific behavior or skill demonstrated by consistently superior performance, measured against established or popular standards.

Do NOT Report Preparatory Method Codes

During this year's renewal, we found a large number of laboratories' PT results did not get uploaded because the method code reported was associated with a preparatory technique, like a digestion or distillation.

One good example is Total Kjeldahl Nitrogen, TKN. A fair number of labs reported no method code, but the method description, SM4500N Org B. If you look up this method in Standard Methods, you will find that “B” refers to the digestion procedure. You must report a method code and description associated with a determinative, or specific analytical, technology. Since the TKN procedure converts all organically bound nitrogen to ammonia (NH₃), a determinative method for TKN is any approved method for ammonia. Therefore, if you analyze the digestate from TKN by ion-selective

electrode, the determinative method should be SM4500NH₃ D. The method code for 20th ed. SM 4500NH₃ D is 20109006.

Total phosphorus is another great example of where this issue rears its head. Many labs reported the method description, 4500P B 5, for their total phosphorus results. Like TKN, the “B” method is the digestion procedure used. Almost every lab uses a colorimetric procedure, and the method code for SM 4500P E (20th ed.) is 20123802.

Please note that a unique method code has been created for each method and each edition of Standard Methods, including the SM Online methods. Therefore there are as many as 5 or 6 method codes for a single Standard Methods method.

*Did you know?
PT “method codes” were established as a NELAC requirement for PT providers. PT method codes are 8 digit numbers. Those beginning with 1 are EPA methods. Standard Methods codes begin with “2”.*

“Which date do I use? Always use the PT Study Close Date.”

“ ‘Quick Response’, ‘Rapid Response’, and other expedited PT samples are acceptable.”

Because it can take up to a month to receive PT results, laboratories are strongly encouraged to participate in PT studies that close well before July 15.

Applying? PTs must be less than 6 months “old”

The requirements for initial and revised applications have not substantively changed with the revision of ch. NR 149, Wisconsin Administrative Code.

Laboratories that are seeking new or updated accreditations in the aqueous or solid matrix, must submit acceptable PT results from either a routine or "rapid response" WP study, analyzed within 6 months, for each analytical technology/analyte combination under application.

Laboratories seeking initial or additional accreditations in the drinking water matrix

must submit acceptable PT results from either a routine or "rapid response" WS study, analyzed within 6 months, for each method/analyte combination under application.

When determining whether your PTs are sufficiently recent, the Lab Certification starts with the date on which the application was officially received and then counts back 6 months (180 d). Any PT results submitted with the application must have a study close date no earlier than this date.

August 15th is the deadline for renewal PTs

During renewal this past summer, many labs seemed surprised by the new PT submittal deadline for accreditation renewal. We made an allowance this year, but that was a one-time consideration.

If a PT is required for any analytical technology/analyte or analyte group, an acceptable WP study PT result must be submitted for renewal. For annual renewal of accreditation, laboratories must analyze PTs with study close dates after January 1. PTs with study close dates between September and December can only be used for applications). What has changed is the cut-off date for PT submittal. **All PT results must be received by WDNR by August 15 for renewal.**

Many commercial PT providers offer WP and WS studies each month. Every PT study is open for 45 days from the day the PTs are shipped to laboratories. After a routine study closes, PT providers can take up to 30 days to issue reports to participating laboratories. For example, one provider shipped samples to laboratories on February 4, 2008. All results had to be reported by March 20, 2008. These results were provided to the WDNR on April 18, 2008. Reports to

laboratories were sent the same day.

Because it can take up to a month to receive PT results, laboratories are strongly encouraged to participate in PT studies that close well before July 15.

Since laboratories must submit an acceptable result for each analytical technology/analyte or analyte group that has a PT requirement, participating in studies earlier in the year will allow more time to address any failures. If a laboratory fails a PT in a study that closes in July, they will be required to utilize the "rapid response" type samples for renewal. These PTs typically cost significantly more than a routine study.

Those laboratories that participate in the Wisconsin State Laboratory of Hygiene PT Program typically have a shorter timeframe in which to analyze samples. This allows the WSLH to offer three studies between the months of January and July. Laboratories that fail WSLH PTs are automatically shipped the next study.

PT Grading & Evaluation: Not Like NELAC

At the heart of this issue lies a difference between Wisconsin's PT requirements, and the NELAC requirements adopted by approved PT Providers.

Under the NELAC rules, one or more analytes for multi-component analyses may be considered "negative challenge" analytes. These analytes are not "spiked" (assigned concentration value of =0) in the PT sample, and the challenge is to correctly identify that these analytes are not present. Any lab that correctly reports one of these analytes as being < LOD, receives a grade of "Acceptable".

Wisconsin, however, requires an analyte to be spiked in a PT sample in order to obtain credit. Our program requires successful identification and quantitation for each analyte requiring a PT. In addition, labs are penalized for false positives (*reporting an analyte to be present above the LOD when it's assigned value is zero*) and false negatives (*reporting an analyte as not detected, when its assigned value is greater than the lab's LOD*).

To a "NELAC" lab, our example VOC [see pg 6] PT result would be scored as "Pass" 47 Acceptable, 6 Not acceptable. That

comes to a pass rate of 47/53 , or 88.7%

Our program, however, scores this as a "Fail". Here's how we scored the VOC example on the next page. This is a software subroutine applied to uploaded PT provider files.

Step 1 counts all the "spiked" analytes (assigned value>0) = **26**

Step 2 counts all of the spiked analytes for which "Acceptable/Check for Error" results were obtained = **22**

Step 3 subtracts any "penalties" for false positives or false negatives = **- 2**

Step 4 adjusts the number of correct analytes and calculates a percentage. (22-2) = 20 correct out of 26 = **76.9%**

The program then applies the "80% rule"...meaning that a passing grade for the PT requires a score of at least 80%.

The bottom line is that NELAC gives labs "credit" for every unspiked analyte (*about 27 in this case*) correctly identified as "ND". We don't do that. Our requirements for an acceptable PT results are accurate identification and quantitation for each spiked analyte.

"For Wisconsin's LabCert program, only results for PT analytes with assigned values >0 count."

We acknowledge receipt of PTs with an E-mail

Our database has been set up to send an "auto" e-mail anytime to all those labs whose PT files are updated upon a PT Provider uploading data for a particular study. The system sends these e-mails to the individual e-mail address associated with the laboratory individual identified in our database as the "LabCert Contact".

Dear Lab Contact:			
This email is to confirm that the Wisconsin DNR Laboratory Certification & Registration Program has received electronic proficiency testing results for YourLabName (9-digit FID) .			
Please review your scope of accreditation to ensure that you have submitted PTs for all tests for which you maintain certification or registration. There are several tests for which PTs are not required. A list of these tests is available online, at the program website < http://www.dnr.state.wi.us/org/es/science/lc/pt/ > .			
If results for all tests that require PTs are passes, you have completed the PT requirement for annual renewal.			
If results for tests that require PTs are failures, you must analyze another PT and report acceptable results to the program before August 15th of this year. If your laboratory does not submit acceptable PTs for all tests that require them, your certifications or registrations will expire on September 1.			
If "Ungraded" is listed in the Pass/Fail column, this PT sample has not been graded to date. Please reply to this email for further information.			
Volatile Organics - Solid (Waste, Soil & Tissue)			
* VOC ANALYTE GROUP by GC	10/19/2009 ERA WP 100709K	Ungraded	
1,2-Dibromoethane (EDB) by GC	10/19/2009 ERA WP 100709K	Failed	
1,2-Dibromo-3-chloropropane (DECP) by GC	10/19/2009 ERA WP 100709K	Passed	

"Anytime PT results for your lab are uploaded by a PT provider, you will receive a confirmation report via e-mail."

PT Grading: VOC Example

“The WI DNR LabCert program does not subscribe to the NELAC approach to scoring PT results, particularly for multi-component analyses certified as analyte ‘groups’ (e.g., VOCs, BNAs).”

76.9%
FAIL



“Unlike NELAC, analytes that are not present in the sample, are not evaluated and do not ‘count’ towards the PT evaluation.”

At first glance, the following VOC may look to be worthy of an “Acceptable” evaluation for the VOC analyte group. 47 analytes are “Acceptable”; only 6 are “Not Acceptable”. That appears to be a passing rate of 47/53 or 88.7%

Unfortunately, by our grading protocol, it is not acceptable. The number of spiked

analytes is 26. Four (4) analytes that were spiked were scored “Not Acceptable”. In addition, there were two (2) false positives receiving an evaluation of “Not Acceptable”.

That leaves us with $(26-4-2) \div 26$, which simplifies to $20 \div 26$, or 76.9%. A passing score for “analyte groups” is 80%.

Anal. No.	Analyte	Units	Reported Value	Assigned Value	Acceptance Limits	Performance Evaluation	Method Description
WP Volatiles							
4315	Acetone	µg/L	2.21	0.00		Not Acceptable	EPA 8260B
4320	Acetonitrile	µg/L	0	0.00		Acceptable	EPA 8260B
4325	Acrolein	µg/L	0	0.00		Acceptable	EPA 8260B
4340	Acrylonitrile	µg/L	0	0.00		Acceptable	EPA 8260B
0065	Benzene	µg/L	13.9	17.7	11.9 - 23.5	Acceptable	EPA 8260B
0060	Bromodichloromethane	µg/L	21.6	27.2	18.9 - 36.6	Acceptable	EPA 8260B
0062	Bromoform	µg/L	29.7	34.7	21.6 - 47.4	Acceptable	EPA 8260B
4950	Bromomethane	µg/L	0	0.00		Acceptable	EPA 8260B
4410	2-Butanone (MEK)	µg/L	6.46	24.8	7.22 - 38.7	Not Acceptable	EPA 8260B
5000	tert-Butyl methyl ether (MTBE)	µg/L	18.0	20.0	11.6 - 29.7	Acceptable	EPA 8260B
4450	Carbon disulfide	µg/L	1.50	0.00		Not Acceptable	EPA 8260B
0058	Carbon tetrachloride	µg/L	18.1	26.5	14.9 - 36.5	Acceptable	EPA 8260B
0064	Chlorobenzene	µg/L	23.1	28.2	20.3 - 35.7	Acceptable	EPA 8260B
0061	Chlorodibromomethane	µg/L	32.6	38.2	26.0 - 50.6	Acceptable	EPA 8260B
4485	Chloroethane	µg/L	0	0.00		Acceptable	EPA 8260B
4500	2-Chloroethylvinylether	µg/L	0	0.00		Acceptable	EPA 8260B
0055	Chloroform	µg/L	16.2	19.8	13.6 - 26.6	Acceptable	EPA 8260B
4960	Chloromethane	µg/L	0	0.00		Acceptable	EPA 8260B
4570	1,2-Dibromo-3-chloropropane (DBCP)	µg/L	0	0.00		Acceptable	EPA 8260B
4585	1,2-Dibromoethane (EDB)	µg/L	0	0.00		Acceptable	EPA 8260B
4595	Dibromomethane	µg/L	0	0.00		Acceptable	EPA 8260B
0094	1,2-Dichlorobenzene	µg/L	33.3	48.4	33.4 - 63.0	Not Acceptable	EPA 8260B
0096	1,3-Dichlorobenzene	µg/L	25.8	37.2	24.8 - 47.7	Acceptable	EPA 8260B
0095	1,4-Dichlorobenzene	µg/L	41.3	64.9	43.9 - 81.4	Not Acceptable	EPA 8260B
4625	Dichlorodifluoromethane (Freon 12)	µg/L	0	0.00		Acceptable	EPA 8260B
4630	1,1-Dichloroethane	µg/L	0	0.00		Acceptable	EPA 8260B
0054	1,2-Dichloroethane	µg/L	33.3	39.5	27.4 - 52.4	Acceptable	EPA 8260B
4640	1,1-Dichloroethylene	µg/L	19.5	24.8	13.1 - 36.3	Acceptable	EPA 8260B
4645	cis-1,2-Dichloroethylene	µg/L	14.1	16.9	11.0 - 22.7	Acceptable	EPA 8260B
4700	trans-1,2-Dichloroethylene	µg/L	34.8	44.2	26.2 - 62.3	Acceptable	EPA 8260B
4655	1,2-Dichloropropane	µg/L	0	0.00		Acceptable	EPA 8260B
4680	cis-1,3-Dichloropropylene	µg/L	0	0.00		Acceptable	EPA 8260B
4685	trans-1,3-Dichloropropylene	µg/L	0	0.00		Acceptable	EPA 8260B
0066	Ethylbenzene	µg/L	41.5	61.4	42.3 - 78.0	Not Acceptable	EPA 8260B
4835	Hexachlorobutadiene	µg/L	0	0.00		Acceptable	EPA 8260B
4860	2-Hexanone	µg/L	0	0.00		Acceptable	EPA 8260B
0063	Methylene chloride	µg/L	16.4	21.6	13.0 - 31.3	Acceptable	EPA 8260B
4995	4-Methyl-2-pentanone (MIBK)	µg/L	0	0.00		Acceptable	EPA 8260B
5005	Naphthalene	µg/L	21.3	33.7	11.3 - 43.6	Acceptable	EPA 8260B
5100	Styrene	µg/L	0	0.00		Acceptable	EPA 8260B
5105	1,1,1,2-Tetrachloroethane	µg/L	21.4	25.3	16.4 - 34.1	Acceptable	EPA 8260B
5110	1,1,2,2-Tetrachloroethane	µg/L	0	0.00		Acceptable	EPA 8260B
0059	Tetrachloroethylene	µg/L	26.2	42.0	23.0 - 55.0	Acceptable	EPA 8260B
0067	Toluene	µg/L	26.2	33.8	23.5 - 42.8	Acceptable	EPA 8260B
5155	1,2,4-Trichlorobenzene	µg/L	19.6	41.8	7.61 - 53.3	Acceptable	EPA 8260B
0056	1,1,1-Trichloroethane	µg/L	25.2	33.8	21.2 - 45.0	Acceptable	EPA 8260B
5165	1,1,2-Trichloroethane	µg/L	0	0.00		Acceptable	EPA 8260B
0057	Trichloroethylene	µg/L	28.7	39.7	25.2 - 52.3	Acceptable	EPA 8260B
5175	Trichlorofluoromethane	µg/L	0	0.00		Acceptable	EPA 8260B
5180	1,2,3-Trichloropropane (TCP)	µg/L	0	0.00		Acceptable	EPA 8260B
5225	Vinyl acetate	µg/L	0	0.00		Acceptable	EPA 8260B
5235	Vinyl chloride	µg/L	0	0.00		Acceptable	EPA 8260B
5260	Xylenes, total	µg/L	67.9	98.0	55.8 - 133	Acceptable	EPA 8260B

Changes to List of Analytes Requiring a PT

The list of analytes for which a PT was required in 2009-10 was inconsistent between technologies and was insufficiently comprehensive. Subsequently, we are modifying these lists for accreditation renewal 2010.

Wisconsin's program requires both successful identification and quantitation of any analyte in order to pass a PT for a given analyte. This is in conflict with the NELAC approach that allows a lab to be credited with passing a PT for an analyte

whose assigned value is "0". We believe both identification and quantitation are requisites for passing a PT sample. Consequently, for a number of analytes, labs' certifications could not be renewed.

EXCEPTION: Organochlorine Pesticide, VOC and BNA PT samples.

We have also included the lists of VOC, and BNA analytes for which a PT is required. This requirement applies ONLY to those labs that select certification for an individual customized list of analytes, rather than our "group" certification.

"Effective Jan. 1, 2010, the list of pesticide and herbicide analytes which require a PT is changing significantly."

New for 2010: Acid Herbicides Requiring a PT

Effective January 1, 2010, the following acid pesticides (herbicides) will require a PT. If you are certified or registered for any of these analytes, a PT will be required. Note that to be acceptable, these analytes must be present at a non-zero concentration.

2,4,5-T
2,4,5-TP (Silvex)
2,4-D
2,4-DB
3,5-Dichlorobenzoic acid
4-Nitrophenol
Acifluorfen
Bentazon

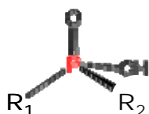
Chloramben
Chlorthal (DCPA Diacid, Dacthal Diacid)
Dalapon
Dicamba
Dichlorprop
Dinoseb (2-sec-butyl-4,6-dinitrophenol)
Pentachlorophenol
Picloram

*"As LabNotes went to press, both **Wibby Environmental and Environmental Resource Associates (ERA)** had agreed to routinely include each of the new **Herbicide** analytes into their PT samples."*

New for 2010: OrganoP Pesticides Requiring a PT

Effective January 1, 2010, the following organophosphate pesticides will require a PT. If you are certified or registered for any of these analytes, a PT will be required. Note that to be acceptable, these analytes must be present at a non-zero concentration.

Azinphos-methyl (Guthion)
Carbophenothion
Chlorpyrifos
Demeton (O,S, Total)
Diazinon
Dichlorovos (DDVP)
Dimethoate
Dioxathion
Disulfoton
Ethion
Ethoprop



Famphur
Fonophos
Malathion
Parathion, ethyl
Parathion, methyl
Phorate
Phosmet (Imidan)
Ronnell
Terbufos
Tetachorvinphos (Stirophos, Gardona)



*"As LabNotes went to press, only **Wibby Environmental** had agreed to routinely include each of the required **Organophosphorus** analytes into their PT samples. **Environmental Resource Associates (ERA)** will include about 75% of these analytes in each PT."*

*“As LabNotes went to press, only **Wibby Environmental** had agreed to routinely include each of the required **Nitrogen/Triazine** analytes into their PT samples. Environmental Resource Associates (**ERA**) will only include about 60% of these analytes in each combined PT.”*

*“As LabNotes went to press, both **Wibby Environmental** and **Environmental Resource Associates (ERA)** had agreed to routinely include each of the required **Carbamate/Urea** analytes” into their PT samples.”*

*“As LabNotes went to press, only **Wibby Environmental** had agreed to routinely include each of the required **Explosives Residue** analytes into their PT samples. Environmental Resource Associates (**ERA**) will routinely include all analytes except **Tetryl** (due to stability concerns) in each PT.”*

New for 2010: Nitrogen Pesticides Requiring a PT

Effective January 1, 2010, the following Nitrogen pesticides will require a PT. If you are certified or registered for any of these analytes, a PT will be required. Note that to be acceptable, these analytes must be present at a non-zero concentration.

Bromacil
Butachlor
Metolachlor
Metribuzin
Alachlor
Butylate
EPTC (Eptam)

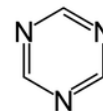
Hexazinone
Napropamide
Pronamide
Propachlor
Terbacil
Trifluralin

New for 2010: Triazine Pesticides Requiring a PT

Effective January 1, 2010, the following Triazine pesticides will require a PT. If you are certified or registered for any of these analytes, a PT will be required. Note that to be acceptable, these analytes must be present at a non-zero concentration.

Ametryn
Anilazine
Atraton
Atrazine
Cyanazine
Deethyl atrazine
Deisopropyl atrazine

Diaminoatrazine (Deethyl-deisopropyl atrazine)
Prometon
Prometryn
Propazine
Simazine

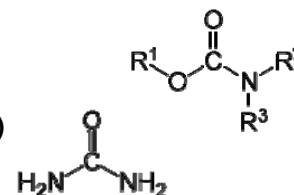


New for 2010: Carbamate Pesticides Requiring a PT

Effective January 1, 2010, the following carbamate (or urea-based) pesticides will require a PT. If you are certified or registered for any of these analytes, a PT will be required. Note that to be acceptable, these analytes must be present at a non-zero concentration.

3-Hydroxycarbofuran
Aldicarb
Aldicarb sulfone
Aldicarb sulfoxide
Baygon (Propoxur)
Carbaryl

Carbofuran
Diuron
Methomyl
Oxamyl (Vydate)
Propham



New for 2010: Explosive Residues Requiring a PT

Effective January 1, 2010, the following explosive residue analytes will require a PT. If you are certified or registered for any of these analytes, a PT will be required. Note that to be acceptable, these analytes must be present at a non-zero concentration.

1,3,5-Trinitrobenzene (1,3,5-TNB)
1,3-Dinitrobenzene (1,3-DNB)
2,4,6-Trinitrotoluene (2,4,6-TNT)
2,4-Dinitrotoluene (2,4-DNT)
2,6-Dinitrotoluene (2,6-DNT)
2-Amino-4,6-dinitrotoluene
2-Nitrotoluene

3-Nitrotoluene
4-Amino-2,6-dinitrotoluene
4-Nitrotoluene
HMX (Octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine)
Nitrobenzene
RDX (Hexahydro-1,3,5-trinitro-1,3,5-triazine)
Tetryl (Methyl-2,4,6-trinitrophenylnitramine)

VOCs

A PT is required for each of these analytes **ONLY** if you are accredited for the individual analytes. Labs certified for the VOC "analyte group" need only analyze a VOC PT subject to our grading criteria (pgs 5-6).

1,1,1,2-Tetrachloroethane	Acetone	Ethylbenzene
1,1,1-Trichloroethane	Acrolein	Hexachlorobutadiene
1,1,2,2-Tetrachloroethane	Acrylonitrile	m/p-Xylenes
1,1,2-Trichloroethane	Benzene	Methyl tert-Butyl Ether (MTBE)
1,1-Dichloroethane	Bromodichloromethane	Methylene chloride
1,1-Dichloroethylene	Bromoform	Naphthalene
1,2,3-Trichloropropane	Bromomethane (Methyl bromide)	o-Xylene
1,2,4-Trichlorobenzene	Carbon disulfide	Styrene
1,2-Dibromo-3-chloropropane (DBCP)	Carbon tetrachloride	Tetrachloroethylene
1,2-Dibromoethane (EDB)	Chlorobenzene	Toluene
1,2-Dichlorobenzene	Chloroethane	trans-1,2-Dichloroethylene
1,2-Dichloroethane	Chloroform	trans-1,3-Dichloropropylene
1,2-Dichloropropane	Chloromethane (Methyl Chloride)	Trichloroethylene
1,3-Dichlorobenzene	cis-1,2-Dichloroethylene	Trichlorofluoromethane
1,4-Dichlorobenzene	cis-1,3-Dichloropropylene	Vinyl acetate
2-Butanone (MEK)	Dibromochloromethane	Vinyl chloride
2-Hexanone	Dibromomethane	Xylenes, Total
4-Methyl-2-pentanone (MIBK)	Dichlorodifluoromethane	

BNAs – Base/Neutrals

A PT is required for each of these analytes **ONLY** if you are accredited for the individual analytes. Labs certified for the BNA "analyte group" need only analyze a BNA PT subject to our grading criteria (pgs 5-6).

1,2,4-Trichlorobenzene	Anthracene	Di-n-butylphthalate
1,2-Dichlorobenzene	Benzidine	Di-n-octylphthalate
1,3-Dichlorobenzene	Benzo(a)anthracene	Fluoranthene
1,4-Dichlorobenzene	Benzo(a)pyrene	Fluorene
1-Chloronaphthalene	Benzo(b)fluoranthene	Hexachlorobenzene
2,4-Dinitrotoluene	Benzo(g,h,i)perylene	Hexachlorobutadiene
2,6-Dinitrotoluene	Benzo(k)fluoranthene	Hexachlorocyclopentadiene
2-Chloronaphthalene	Benzyl alcohol	Hexachloroethane
2-Methylnaphthalene	Benzyl butyl phthalate	Indeno(1,2,3-cd)pyrene
2-Nitroaniline	bis(2-Chloroethoxy)methane	Isophorone
3,3'-Dichlorobenzidine	bis(2-Chloroethyl)ether	Naphthalene
3-Nitroaniline	bis(2-Chloroisopropyl)ether	Nitrobenzene
4-Bromophenyl phenylether	bis(2-Ethylhexyl)phthalate	N-Nitrosodiethylamine
4-Chloroaniline	Carbazole	N-Nitrosodimethylamine
4-Chlorophenyl phenylether	Chrysene	N-Nitroso-di-n-propylamine
4-Nitroaniline	Dibenz(a,h)anthracene	N-Nitrosodiphenylamine
Acenaphthene	Dibenzofuran	Phenanthrene
Acenaphthylene	Diethylphthalate	Pyrene
Aniline	Dimethylphthalate	Pyridine

BNAs – Acid Extractables

2,4,5-Trichlorophenol	2-Chlorophenol	4-Chloro-3-methylphenol
2,4,6-Trichlorophenol	2-Methyl-4,6-dinitrophenol	4-Methylphenol (p-Cresol)
2,4-Dichlorophenol	2-Methylphenol (O-Cresol)	4-Nitrophenol
2,4-Dimethylphenol	2-Nitrophenol	Benzoic acid
2,4-Dinitrophenol	3-Methylphenol (m-Cresol)	Pentachlorophenol
2,6-Dichlorophenol		Phenol

“Most of the old EPA ‘200 series’ methods have been eliminated as approved methods. Use only approved methods!”

“Refer to NR 219 for wastewater approved methods. Refer to NR 809 for drinking water methods.”

202.1
202.2
204.1
Deleted!
206.1
206.2
2...

Don't Use/Report Obsolete/Deleted Methods!

The following is a list of **some** of the methods which have been deleted as approved methods for compliance testing.

If you report method codes associated

with these methods for your PT results, **they will not be acceptable** and will not be uploaded into the Lab Certification database.

Parameter	Deleted Clean Water Act Methods
Acidity	Titrimetric: EPA 305.1 Titrimetric: USGS I-2030-85
Alkalinity	Titrimetric: EPA 310.1 Titrimetric: SM 2310 B (4a)
Aluminum (Al)	FLAA: EPA 202.1 GFAA: EPA 202.2
Ammonia	Colorimetric: EPA 350.2 ISE: EPA 350.3
Antimony (Sb)	FLAA: EPA 204.1 GFAA: EPA 204.2
Arsenic (As)	GFAA: EPA 206.2 Hyd AA: EPA 206.3 Colorimetric: 206.4
Barium (Ba)	FLAA: EPA 208.1 GFAA: EPA 208.2
Beryllium (Be)	FLAA: EPA 210.1 GFAA: EPA 210.2
BOD (Biochemical Oxygen Demand)	BOD Assay: EPA 405.1
Boron	Colorimetric: 212.3
Bromide	Titrimetric: EPA 320.1
Cadmium (Cd)	FLAA: EPA 213.1 GFAA: EPA 213.2
Calcium (Ca)	FLAA: EPA 215.1 Titrimetric: 215.2
COD (Chemical Oxygen Demand)	Colorimetric: EPA 410.1 Colorimetric: EPA 410.2
Chloride	Colorimetric: EPA 325.1 Colorimetric: EPA 325.2 Colorimetric: EPA 325.3
Chlorine Residual, Total	Titrimetric: EPA 330.1 Titrimetric: EPA 330.2 Titrimetric: EPA 330.3 Titrimetric: EPA 330.4 Colorimetric: EPA 330.5
Chromium, Hexavalent	FLAA: EPA 218.3 FLAA: EPA 218.4
Chromium, Total (Cr)	FLAA: EPA 218.1 GFAA: EPA 218.2 FLAA: EPA 218.3
Cobalt (Co)	FLAA: EPA 219.1 GFAA: EPA 219.2
Copper (Cu)	FLAA: EPA 220.1 GFAA: EPA 220.2
Cyanide, Total	Colorimetric: EPA 335.2 Colorimetric: EPA 335.3
Cyanide, Available	Titrimetric: EPA 335.1 Colorimetric: EPA 335.1
Fluoride	Colorimetric: EPA 340.1 (SPADNS) ISE: EPA 340.2 Colorimetric: EPA 3405.3
Gold (Au)	FLAA: EPA 219.1 GFAA: EPA 219.2
Hardness	Titrimetric: EPA 130.2
pH	ISE: EPA 150.1
Iron (Fe)	FLAA: EPA 236.1 GFAA: EPA 236.2
TKN (Total Kjeldahl Nitrogen)	Titrimetric: EPA 351.3 ISE: EPA 351.3 Colorimetric: EPA 351.3 (Nessler) Colorimetric: EPA 335.4
Lead (Pb)	FLAA: EPA 239.1 GFAA: EPA 239.2
Magnesium (Mg)	FLAA: EPA 242.1

Parameter	Deleted Clean Water Act Methods
Manganese (Mn)	FLAA: EPA 243.1 GFAA: EPA 243.2
Molybdenum (Mo)	FLAA: EPA 246.1 GFAA: EPA 246.2
Nickel (Ni)	FLAA: EPA 249.1 GFAA: EPA 249.2
Nitrate+Nitrite (NO ₃ +NO ₂)	Colorimetric: EPA 353.1 Colorimetric: EPA 353.3
Nitrite (NO ₂)	Colorimetric: EPA 354.1
Oil&Grease	Gravimetric: EPA 413.1
TOC (Total Organic Carbon)	Combustion/Oxidation: EPA 415.1
Orthophosphate (oPO ₄)	Colorimetric: EPA 365.2
Phenolics, Total	Colorimetric: EPA 420.2
Phosphorus, Total	Colorimetric: EPA 365.2
Potassium (K)	FLAA: EPA 258.1
Total Solids (Residue, Total)	Gravimetric: EPA 160.3
TDS Total Dissolved Solids (Residue, Filtrable)	Gravimetric: EPA 160.1
TSS Total Dissolved Solids (Residue, Non-Filtrable)	Gravimetric: EPA 160.2
Settleable Solids	Gravimetric: EPA 160.5
Selenium (Se)	GFAA: EPA 270.2
Silica	Colorimetric: EPA 370.1
Silver (Ag)	FLAA: EPA 272.1 GFAA: EPA 272.2
Sodium (Na)	FLAA: EPA 273.1
Sulfate	Colorimetric: EPA 375.1 Gravimetric: EPA 375.3 Colorimetric: EPA 375.4
Surfactants (MBAS)	Colorimetric: EPA 425.1
Thallium (Tl)	FLAA: EPA 279.1
Tin (Sn)	FLAA: EPA 282.1 GFAA: EPA 282.2
Titanium (Ti)	FLAA: EPA 283.1
Vanadium (V)	FLAA: EPA 286.1 GFAA: EPA 286.2
Zinc (Zn)	FLAA: EPA 289.1
Titanium (Ti)	FLAA: EPA 283.1
Vanadium (V)	FLAA: EPA 286.1 GFAA: EPA 286.2
Zinc (Zn)	FLAA: EPA 289.1

Report PT Results by the Correct Technology

One other problem that cropped up during accreditation renewal was that labs analyzed PTs, but analyzed them using a different technology than what they were actually accredited for.

Example: *Lab X reported PT results using SM 3111B, an FLAA method. The lab is certified for these metals by GFAA.* The lab had to do another PT, and use GFAA this time.

A number of labs were initially (9/1/08) accredited for various pesticides by both GC and GC/MS, but only submitted PT data analyzed using one of the technologies. Check your Scope of

Accreditation before reporting PT results and make sure you have all technologies covered for a given analyte before submitting your results to the PT Provider.

Remember: you can report results from several different technologies for any given PT. The only limitation is the volume of PT sample available for analysis.

This happens frequently with wet chemistry. A cross-reference list of technologies based on common wet chemistry methods is provided on our website at:

<http://www.dnr.state.wi.us/org/es/science/lc/APPLICATION/Method2Technology.pdf>

“If you are certified for Lead by GFAA and you report an FLAA method code with your PT data, you will not get credit.”

WEP (Water Extractable Phosphorus) Reporting

There is a long standing problem with reporting Parameter 686 Water Extractable Phosphorus on Characteristic Report (49) forms.

Often the confusion facilities have is the outcome of not knowing how to interpret test results on lab reports. Those most involved believe that the situation can be greatly improved if labs would spell out the parameter 686 as it is required to be reported on 49 forms, which is **Water extractable P as a percent of total P.**

A number of issues have been raised regarding how permittees report Water Extractable Phosphorus results for their biosolids. There appears to be some confusion in that some are reporting the results as Percent of P per kg of biosolids. It should be reported as a Percent of the total Phosphorus. Here is an example:

1. Water extractable P should be expressed as a percent of the total P, after calculating the Standard WEP in the following way:
 - Standard WEP (WEP) -- as mg of P per kg of biosolids or other P-source (dry weight).

Percent WEP (PWEP) = (WEP ÷ P_T) × 100. P_T = total P as mg of P per kg of biosolids or other P-source (dry weight) via acceptable method (e.g. EPA Digestion Method 3050 or 3051 and analytical Method 6010 or 6020, or Standard Method 4500-P; etc.) This equals the portion of total phosphorus which is water extractable.

Example:

Standard WEP = 1,000 mg P/kg biosolids (dry weight) = 0.1% dry weight

Total P = 30,000 mg P/kg biosolids (dry weight) = 3.0% dry weight

PWEP = (1,000 ÷ 30,000) × 100 = 3.3%. This means that 3.3% of the Total P is water extractable; this is the result that should be reported to the agency.

An attempt to clarify this has been made by changing the units in the nutrient 'picklist' to % of Total P for the parameter Phosphorus, Water Extractable.

“WEP (Water Extractable Phosphorus must be reported in units of % of the total Phosphorus.”

“It would be helpful if labs reported WEP as ‘Water extractable P as a % of Total P.’”



Sharing Lab Data and the Open Records Laws

The State of Wisconsin's policy is to have the government accountable. Hence, most records that the State maintains are open to the public. The "Open Records Law" can be found in Chapter 19, subchapter II of the State Statutes. When State Agencies receive data they need to consider the following:

- Trade Secrets
- Privileged information
- Confidential information
- Personally identifiable Information

Trade Secrets

Trade secrets in most cases do not apply to environmental testing data. It could apply in regard to waste treatment information and data.

should be granted. State Statutes set standards for confidentiality for a number of programs (e.g., *metallic mining prospecting data*). There are no provisions in State Statutes for confidentiality for drinking water. However, a request can still be made for the data to be confidential and if it meets the criteria set in State Adm. Code NR 2, then the request can be granted.

Personally Identifiable Information

Data collected by the State regarding private wells is stored in a secure location behind a firewall. Some of this information is available to the public. However, the personally identifiable information is not available to the general public. State Statutes prohibits sharing personally identifiable information.

Open Records Information Resources

Visit the DNR web page on open records at:

<http://dnr.wi.gov/aboutdnr/legal/openrecords.html>

Department of Justice's information on the "Open Records Law":

http://www.doj.state.wi.us/dls/2008-PRCO/2008_Pub_Rec_Outline.pdf

Request for confidential status under NR 2.19, Adm. Code

<http://www.legis.state.wi.us/rsb/code/nr/nr002.pdf>

Do I need to submit all of my monitoring data or can I choose what data to submit?

Many monitoring programs require that you submit all the data collected. A laboratory or facility can not pick and choose which data to provide to determine compliance.

"A condition of federal funding may include providing the funding agency with our monitoring data."

Privileged Information

Certain information is protected as privileged information. These include attorney-client and doctor-patient information. This type of data in general is not submitted to DNR. Privileged information would also be information gathered by the State as part of an enforcement investigation.

Confidential Information

When data is collected by the State, one can request that the information be treated as confidential. That request, if granted, would mean that the data would not be shared with the public under the "Open Records Law". The State Agency must make a decision as to whether the request

Is information I submit to one State Agency shared with other agencies?

Yes, it can be. Many times different state and local agencies have overlapping missions. An example is protecting public health. DNR, Department of Health Services, the State Laboratory of Hygiene, and local health departments all share this same mission. So if Madison & Dane County Health Department is investigating arsenic in the county's groundwater, then the state agencies will provide the information when requested. Much of the work that is done by state agencies is funded by federal agencies. A condition of federal funding may include providing the funding agency with our monitoring data.

VOCs – Changes on the Landscape

There are some recent changes (some proposed) regarding VOCs.

NR 140 is proposing the addition of:

- ▶ 1,4-dioxane (PAL 0.3 ug/l)
- ▶ chlorodifluoromethane (PAL 700 ug/l)
- ▶ ethyl ether (PAL 100 ug/l)
- ▶ tertiary butyl alcohol (PAL 1.2 ug/l)

In addition some of the enforcement standards (ES) and preventive action limits (PAL) will be changing for other VOCs.

NR 809 is proposing addition of MtBE as a special monitoring contaminant.

Hearings for NR 809 will be in October and NR 140 this winter.

EPA published method 524.3 in June 2009 and added:

- ▶ Chlorodifluoromethane
- ▶ diisopropyl ether
- ▶ methyl acetate
- ▶ t-amyl ethyl ether
- ▶ t-amyl methyl ether
- ▶ t-butyl alcohol.

“✓ 4 proposed additions to NR 140 PALs.

✓MtBE proposed as additional contaminant in NR 809.

✓New SDWA method for VOCs:

GEMS – Blank Detections and Reporting QC Flags

Reporting Groundwater Monitoring Results to GEMS - New QC Failure Criteria

As of December 1, 2009 the Department is asking labs to change the criteria they use to report quality control (QC) failures for samples when a parameter is detected in an associated method, trip or field blank. For all data submitted to the groundwater and environmental monitoring system (GEMS), please use the following new relaxed criteria:

Only report a QC Flag I failure (“F”) for a sample if the concentration of a parameter in the associated method blank, trip blank or field blank exceeds the highest of any of the following values for that parameter:

1. The limit of detection;
2. Five percent of the lowest applicable regulatory limit (e.g., NR 140 groundwater quality preventive action limit); or
3. Ten percent of the measured concentration in the sample.

Before this change, a QC Flag I failure had to be reported for a sample if the concentration of a parameter in the associated method, trip or field blank exceeded the limit of detection for that parameter. This criteria was more restrictive than that specified by EPA or the Laboratory Certification program. The new requirement is consistent with the Lab Certification program’s criteria.

Jack Connelly, the Solid Waste Program Coordinator, sent a November 10 email to the environmental contact at each of the facilities submitting data to GEMS informing them of this change. If you have any questions about this change, please contact Jack at 608-267-7574 or johnston.connelly@wisconsin.gov.



“Reporting requirements for QC Flags change effective 12-01-2009”

“ Before this change, facilities had to report a failure for a quality control flag any time a blank had a detect for a given parameter above the LOD. ”

“Effective June 1, 2009, the electro-optical techniques for measuring DO—and thus BOD—were approved.

LDO-- or luminescence DO-- techniques are now approved for use in Wisconsin.”



“PTs are required for: cBOD, HEM, TDS, alkalinity, acidity, orthophosphate, and nitrite.”

NR 219 Update Finalized

On June 1, 2009, changes to NR 219, the administrative rule that governs approved methodologies for wastewater monitoring took effect.

In March 2007, the EPA published final rules that promoted sweeping changes related to analytical methods for NPDES monitoring. Revisions to NR 219 were made to bring Wisconsin into compliance with these federal standards which were promulgated two years previously.

One of the major impacts of this rule change was to delete numerous methods considered obsolete (see page 10).

Although the rule revision deleted many analytical methods, the rule retains at least one method for any regulated analyte. The rule also reduces the use of reagents containing mercury with the elimination of 14 additional methods. In sum, the rule maintains 504 methods from the previous version, deletes 62, and approves 366 additional ones.

One key method addition is the approval of luminescence technology (LDO) for the analysis of dissolved oxygen. LDO and similar “electro-optical” technologies are now also approved for BOD analysis.

NR 528 – Stormwater Retention Pond Sediments

NR 149 requirements must be met by laboratories, “*generating data that is necessary for the department to determine compliance with a covered program*”.

NR 528 is a new administrative rule dealing with analytical requirements associated with disposal of sediments removed from stormwater retention ponds.

NR 528, a new “covered program”, sets up self-implementing procedures which allow the person responsible for the sediment to complete a worksheet to determine whether sampling is required and if so, has an environmental professional direct

the sampling and analysis, evaluate the results, determine an appropriate use based on the information and sign a certification form documenting the steps taken and end use chosen.

In situations where the sediment is removed from a pond draining a low-risk land use, sampling is not required and the person responsible for the sediment completes a shorter version of the certification form and documents how they will use the sediment. In most cases the department’s involvement would be minimal and a fee not required.

• **NR 528 promulgation is expected to be finalized in early 2010** •

PTs are required for these parameters

One final mix-up we encountered during accreditation renewal this year was that a number of labs apparently did not realize that PTs were required for parameters which had previously not specifically required a PT.

The affected analytes are: cBOD (carbonaceous BOD), HEM (Hexane Extractable Material), TDS (Total

Dissolved Solids, or filterable residue), alkalinity, acidity, orthophosphate, and nitrite.

Please note that these parameters DO require a PT for each technology. **The State Lab of Hygiene will be providing PTs for each of these parameters in 2010.**

Drinking Water Lab Data Entry Reminders

The following are some updates and reminders related to drinking water lab data submittals.

User ID and Password

In order to transmit your public drinking water monitoring data to the DNR you must have a user ID from the Wisconsin Access Management System. These IDs are not meant to be used lab wide. Rather each person should have their own ID and password. Information Technology (IT) folks are sensitive about this subject and are very concerned with security. One should never share a password! Also, you should have more than one person in your lab to do this. Having backups is always a good idea. If you need an ID go to <https://on.wisconsin.gov/WAMS/SelfRegController>. Once you have done this go to <http://www.dnr.wi.gov/environmentprotect/switchboard/ebp.html> to register with DNR to use the drinking water data entry system. Both registrations are easy to do.

Confirmation E-mail

After you submit your data via web form or file drop, you should get an e-mail giving you the status of the data. Be sure to read these e-mails to see if the system accepted your results. If it did not, it should tell you what needs to be corrected.

Data Available on the Web

Also note that your public drinking water results should be available on the DNR website the next morning. So

if you want to double check your results go to:

[http://prodoasext.dnr.wi.gov/inter1/pws2\\$.startup](http://prodoasext.dnr.wi.gov/inter1/pws2$.startup) and enter the PWS number of the facility in question.

Monitoring Sites

The Public Drinking Water Program will be requiring that Monitoring Site IDs also be reported for all samples. Changes will be made to the online forms and the Drinking Water Lab Sample Entry system. The file drop system can already handle the information, but you will need to add it to your exported files. Keep your eyes open for more information on this.

Private Well Water

DNR is in the process of allowing laboratories to enter or drop files for private well testing. The web form is being developed and it is planned to use the same system for dropping files as the public water system (just need the well ID rather than the PWS #). The new system should be available before next summer. We will let you know when it is available. We hope laboratories will use this system for both the compliance data on new wells and pump work, but also for non-compliance results. Data from the non-compliance work will help us all better understand the quality of our state's groundwater and protect the health of our citizens. If you are interested in helping us test the new system call or e-mail Ron Arneson (608.221.6322) (Ronald.Arneseon@wi.gov).

“The Public Drinking Water Program will soon require that Monitoring Site IDs be reported for all samples.”

DNR Drinking Water System

Public Water Supply Systems

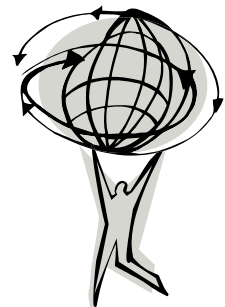
Enter query criteria for Public Water Supply Systems

Name:

DNR Public Water Supply ID:

Type:

- Municipal community
- Non-transient, non-community
- Other than Municipal, community



Check out our
fee calculation
spreadsheet:

[www.dnr.state.wi.us/org/es/
science/lc/APPLICATION/
Application%20Fee%20Calculator.xls](http://www.dnr.state.wi.us/org/es/science/lc/APPLICATION/Application%20Fee%20Calculator.xls)

NOTE: Conversion from Certified to Registered (\$172.50) or Registered to Certified (\$460.00) does require an application and fee.



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We're on the Web!

[www.dnr.state.wi.us/org
/es/science/lc/](http://www.dnr.state.wi.us/org/es/science/lc/)

Application Fee Reminders

Many labs are overpaying when it comes to applications.

Base Fees

If you are already an accredited lab, then you have already paid an annual base fee; you do NOT have to pay it again. The only two cases where you need to pay a base fee are for a new lab, or a lab switching from registration to certification (*must pay the difference in base fee between certification and registration*).

Matrix Fees

If you are already accredited for any technology/class for a given matrix, then you do NOT pay that matrix fee.

Example 1: Lab is certified only for drinking water matrix, wants to add GC/MS under aqueous and solid matrices. *Pay the matrix fee for aqueous and solid matrices.*

Example 2: Lab is adding new technologies to a matrix for which they are already accredited. *Pay no matrix fee.*

Technology (Class) fees

If you already are accredited for a given technology in a given matrix (or "class" for drinking water), then you do NOT pay that technology fee for that matrix.

Example1: Lab is certified for GC and ICP in aqueous and solid matrices; wants to add GC/MS. *GC/MS technology fee for both aqueous and solid is required.*

Example2: Lab is certified for VOCs by GC/MS in aqueous and wants to add BNAs by GC/MS. *GC/MS technology fee is NOT required.*

A fee calculation spreadsheet is available at:

www.dnr.state.wi.us/org/es/science/lc/APPLICATION/Application%20Fee%20Calculator.xls

LabNotes Fall 2009

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