

# ***Virginia Environmental Laboratory Accreditation Program***

## **NOTICE**

### **IMMEDIATE ANALYSIS TESTING FOR VPDES and VPA COMPLIANCE**

**April 12, 2012**

Virginia's Division of Consolidated Laboratory Services (DCLS) and the Department of Environmental Quality (DEQ) provide this joint communication regarding non-potable water samples tested for compliance for Virginia Pollution Discharge Elimination System (VPDES) permits and Virginia Pollutant Abatement (VPA) permits, for which the holding time established by 40CFR136.3, Table 1I, is a maximum of 15 minutes.

**DCLS and DEQ have jointly determined that accreditation of testing that requires immediate analysis, i.e., testing required within 15 minutes of collection and commonly called "field testing", shall be limited only to those facilities demonstrating that maximum hold times can be consistently met for received samples. Typically the holding time for these immediate analysis tests can be consistently met only when the sampling site and the facility are on the same premises, for example, a noncommercial laboratory serving a wastewater treatment plant or a commercial laboratory located on an industrial sampling site.**

See Table 1 for a listing of analytes and methods affected by this change to certification parameters offered by DCLS.

#### **The following reasons support the cessation of accreditation for VPDES and VPA compliance testing:**

- VPDES and VPA compliance data requires valid analyses which meet the quality provisions of the method. The quality provisions of the method include holding times as well as quality control parameters.
- DEQ requires that any VPDES and VPA compliance samples tested and reported outside of the maximum holding time must be qualified or 'flagged' as "Not meeting holding time requirements."
- DCLS will not approve, certify or accredit a laboratory's practice of routine qualification of data for recurring and/or preventable reasons. Qualification of data on a routine basis is evidence that the laboratory's quality system is not effective in those circumstances, and such issues are cause for a decertification of that parameter.
- DEQ continues to maintain oversight and monitoring of field activities and of the testing requiring immediate analysis.
- When analyses such as pH, residual chlorine, dissolved oxygen, and temperature are a required part of another certified test method (such as BOD), the laboratory's performance of these intermediate parameters will be evaluated by DCLS as they relate to the certified test method.

In these cases the results of the “intermediate” test are not being reported to DEQ and are not required for certification/accreditation.

**Guidance for the cessation of accreditation for immediate analysis testing:**

- Effective June 15, 2012, DCLS will no longer offer accreditation under 1VAC30-46 for the analytes and methods listed in Table 1, and for any omissions to that table as determined by DEQ, unless the laboratory has demonstrated that hold times are consistently met.
- This announcement serves as notice of change to a laboratory’s certificate under 1VAC30-46 for laboratories holding accreditation for tests listed in the attached table.
- Certificates issued on or after June 15, 2012 will reflect this cessation of accreditation for immediate analysis testing.
- DCLS will not initiate a change for laboratories certified under 1VAC30-45 for immediate analysis testing. The laboratory must continue to demonstrate that the holding time for these tests can be met in order to maintain certification for these test methods.
- For a laboratory accredited under 1VAC30-46 located at the primary sampling site, the laboratory may request to retain accreditation for immediate analysis testing parameters by providing documentation to support the laboratory’s ability to consistently meet the limited hold time for received samples. This request must be made immediately in order to retain accreditation.
- DEQ will monitor VPDES and VPA compliance data for immediate analysis testing through its oversight of field activities. If a commercial laboratory conducts field testing for the parameters identified in Table 1, then the report must specify that the results are not NELAC accredited (NELAC 2003 5.5.10.2).

TABLE 1: PARAMETERS AND METHODS FROM 40CFR136.3 FOR WHICH HOLDING TIME IS DESIGNATED AS "ANALYZE WITHIN 15 MINUTES"

Parameter	Method	Edition
Chlorine, total residual	SM 4500-Cl D, SM 4500-CL D-00	18th, 19th, 20th, online editions
Chlorine, total residual	SM 4500-Cl E, SM 4500-CL E-00	18th, 19th, 20th, online editions
Chlorine, total residual	SM 4500-Cl B, SM 4500-CL B-00	18th, 19th, 20th, online editions
Chlorine, total residual	SM 4500-Cl C, SM 4500-CL C-00	18th, 19th, 20th, online editions
Chlorine, total residual	SM 4500-Cl F, SM 4500-CL F-00	18th, 19th, 20th, online editions
Chlorine, total residual	SM 4500-Cl G, SM 4500-CL G-00	18th, 19th, 20th, online editions
Chlorine, total residual	Orion Research Instruction Manual; Electrode Model 97-70	1977
Chlorine, total residual	ASTM D1253-86 (96), 03	
Hydrogen ion (pH)	SM 4500-H+ B, SM 4500-H+ B-00	18th, 19th, 20th, online editions
Hydrogen ion (pH)	ASTM D1293-84 (90), 99 (A or B)	
Hydrogen ion (pH)	AOAC 973.41	
Hydrogen ion (pH)	EPA 150.2	Dec-82
Hydrogen ion (pH)	USGS I-1586-85	1985
Hydrogen ion (pH)	USGS I-2587-85	1985
Oxygen, Dissolved probe	SM 4500-O C, SM 4500-O C-01	18th, 19th, 20th, online editions
Oxygen, Dissolved probe	SM 4500-O G, SM 4500-O G-01	18th, 19th, 20th, online editions
Oxygen, Dissolved probe	ASTM D888-92, 03 (B)	
Oxygen, Dissolved probe	USGS I1576-78	
Oxygen, Dissolved probe	USGS I1575-78	
Oxygen, Dissolved probe	AOAC 973.4 5B	
Sulfite	SM 4500-SO <sub>3</sub> <sup>2-</sup> B, SM 4500-SO <sub>3</sub> <sup>2-</sup> B-00	18th, 19th, 20th, online editions
Temperature	SM 2550 B, SM 2550B-00	18th, 19th, 20th, online editions