



C. Earl Hunter, Commissioner

Promoting and protecting the health of the public and the environment.

Memorandum

To: All Certified Laboratories and NPDES Dischargers

From: Carol F. Smith, Director *CF*
Office of Environmental Laboratory Certification

Date: May 14, 2009

Subj: South Carolina's Exemption from the EPA's DMR-QA Study

On May 14, 2009, notification was received from the U. S. Environmental Protection Agency (EPA) that our request for an exemption from the National Pollutant Discharge Elimination System's (NPDES) Discharge Monitoring Report-Quality Assurance (DMR-QA) was granted by EPA, Region 4. It was determined that the South Carolina Department of Health and Environmental Control (SC DHEC) proficiency testing (PT) program requirements provide adequate QA to replace EPA's DMR-QA study program.

This DMR-QA exemption request was granted on May 14, 2009. Therefore the EPA's DMR-QA 29 Study packets will not be received by the NPDES major dischargers located in South Carolina.

All certified laboratories are still required to perform the required proficiency testing samples according to State Regulation 61-81 as specified in Section G(2)(a), but major dischargers will no longer be required to file the paperwork with the State required by the DMR-QA Study. Also contract laboratories will no longer be required to report their proficiency testing results to the permittees for reporting to the EPA.

The EPA is now shifting the focus of the DMR-QA study toward laboratory proficiency. The EPA addressed the need to eliminate/reduce the duplication between the DMR-QA program and State Certification Programs that are already certifying laboratories participating in the DMR-QA for the same methods.

The State of South Carolina currently operates a certification program for laboratories reporting analyses under the Safe Drinking Water Act, Clean Water Act, and Resource Conservation and Recovery Act. Our State Regulation 61-81 covers any analyses related to environmental quality evaluations required by the Department or which will be officially submitted to the Department. Therefore all facilities reporting analyses required by their NPDES permit on their DMRs must use a certified laboratory for performing these analyses.

Our certification program requires the annual acceptable analysis of proficiency testing (PT) samples by all laboratories to maintain certification. The required parameters that must be tested are based on the TNI FoPT tables and include more parameters than the DMR-QA study. Also, our program maintains a database (EFIS – Environmental Facility Information System) that tracks a laboratory's PT performance on an annual basis. Follow-up actions are maintained in our files and database.

Please remember that certified laboratories must still perform the required PT samples on an annual basis with acceptable results. Also be reminded that it has always been the responsibility of the permittee to verify the certification of their contract laboratory (ies). The DMRs for all of the NPDES dischargers are maintained on the Department's database (EFIS) and the Bureau of Water is able to review the parameters and laboratories performing their permit required parameters and verify their certification. If you have any questions about how this exemption affects your laboratory, please refer to our website at www.scdhec.gov/labcert or contact our office at (803) 896-0970.

cc: Pat Walker, Bureau Chief, Bureau of Environmental Services
David Wilson, Bureau Chief, Bureau of Water

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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