



C. Earl Hunter, Commissioner

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

Memorandum

To: All South Carolina Certified Laboratories

From: SCDHEC Office of Environmental Laboratory Certification

Date: February 6, 2009

Re: New Proficiency Testing Requirements for South Carolina

This memorandum serves as official notice of changes to the SCDHEC Office of Environmental Laboratory Certification proficiency testing requirements for drinking water, wastewater, and solid and hazardous waste parameters. Our proficiency testing guidance document along with the Water Supply (WS) and Water Pollution (WP) parameter lists are enclosed. The changes to the requirements are detailed below:

Microbiology – Safe Drinking Water Act

Laboratories that are certified for microbiological enumeration methods such as membrane filtration (MF) and most probable number (MPN) under the Safe Drinking Water Act are now required to analyze a WS PT sample for enumeration in addition to the presence/absence PT. If your laboratory is certified for either total coliform (MF), fecal coliform (MF), total coliform (MPN), total coliform/E.coli (MPN), fecal coliform (MPN), or any E. coli enumeration method under the Safe Drinking Water Act and enumeration results are being reported for compliance for total coliform, fecal coliform, and/or E. coli, then an additional PT for enumeration must be analyzed. However, if your laboratory is only using the enumeration methods to report results as presence/absence, then the additional enumeration PT is not required. In this case, only the presence/absence WS PT sample is required. Each laboratory must check to see if it is enumerating total coliforms, fecal coliforms, and/or E. coli. for drinking water compliance. This is the determining factor for the additional WS PT requirement. If you have any questions regarding this issue, please contact Alfred Baquiran at (803) 896-0977 or baquirai@dhec.sc.gov.

Solid and Hazardous Waste Proficiency Testing Samples

Laboratories are now required to analyze and report PT sample results for all applicable solid and hazardous waste aqueous parameters and/or methods. Laboratories will be required to use the WP PT study to report results for parameter and/or method they are certified to perform. Although some wastewater and solid and hazardous waste methods may use the same technology, each method must still be reported to ensure that the method required QC is met. For example, if the laboratory is certified for EPA Methods 624 and 8260B or EPA Methods 200.7 and 6010C, both methods must be reported for the PT results. This can be accomplished by reporting results for both methods individually in the same study or as a combination such as "EPA 624/8260B" or "EPA 200.7/6010C". The SW-846 Methods will not be accepted in lieu of the wastewater methods since there are different quality control requirements between the methods and since the wastewater methods are required for wastewater compliance reporting. Please also note that the revision letter for the SW-846 Methods must also be noted to ensure the PT sample was analyzed according to the current revision. If you have any questions regarding this requirement please contact Susan Butts at (803) 896-0978 or buttsse@dhec.sc.gov or James Berry at (803) 896-0976 or berryc@dhec.sc.gov.

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Late PT Reports

Our Office will no longer be able to accept any PT study results after the calendar year (December 31) for instances where SC was not designated to receive a copy of the report. You must designate on the PT results submitted to the provider that SC is to receive a copy of the report when you submit your results. If the results are not received from the PT providers by December 31st, you will be decertified for the applicable parameters and you must reapply for certification. If we were designated to receive a report and there was an error on the PT provider's part, then we must receive a letter from the PT provider identifying the error that occurred. We can no longer receive these reports after December 31st due to program constraints and to better streamline the PT program.

Whole Effluent Toxicity

One acceptable PT sample for each parameter or method is required annually. Since there is currently only one PT sample (DMR-QA) offered per year for WET, the laboratory must participate in a quick-turnaround or supplemental PT study to satisfy the annual PT certification requirement for WET. This only applies to the WET parameters as quick-turnaround studies are not allowed for any other parameters.

Corrective Action Required for Unacceptable PT Results

Laboratories are now required to submit corrective action for all unacceptable PT results. The corrective action required will be a letter identifying why the failure occurred, what was done to resolve the problem, and the participation in another PT study with an acceptable performance. Letters of corrective action must be submitted within 30 days upon receipt of the final PT report. Acceptable results for any failed parameters must be received in our office by the PT provider by December 31st.