

**TITLE 252. DEPARTMENT OF ENVIRONMENTAL QUALITY
CHAPTER 302. FIELD LABORATORY ACCREDITATION**

SUMMARY OF COMMENTS AND RESPONSES

COMMENT PERIOD: December 3, 2018 through January 2, 2019

1. COMMENT: OAC 252:302-1-4 Definitions

AEP:PSO recommends replacing the term, " . . . out-of-time . . . " with " . . . temporary . . . " in the definition of "Interim accreditation."

RESPONSE: DEQ prefers the term "out-of-time as it is consistent with the other lab accreditation rules and has been utilized for many years.

2. COMMENT: OAC 252:302-3-4(5)

Solae: It is the understanding of Solae that the DEQ laboratory evaluation required under this paragraph applies only to new applications, and that renewals do not required a DEQ evaluation. Is this correct?

RESPONSE: No this is incorrect. This applies to all laboratory applications- initial, renewal, or interim.

COMMENTS RECEIVED AFTER THE COMMENT PERIOD

3. COMMENT: OAC 252:302-3-4(5)(d)

Koch Fertilizer Enid, LLC ("KFE") suggests that the proposed inclusion of a 3 – 5 day time requirement when applied to a pH probe governed by EPA Method 150.2 1982 methodology, is inefficient and unnecessary to demonstrate technician capability. KFE notes that the application of identical QA/QC methods to both continuous measurement and benchtop devices will not yield improved data quality and suggests that existing protocols (using one unknown) and the Quality Control criteria contained in EPA Method 150.2 are adequate to ensure the accuracy of the results. Alternatively, KFE proposes that ODEQ consider allowing the use of Standard Method 4500 H+ (or equivalent) as an acceptable means to demonstrate the capability requirements for EPA Method 150.2 if ODEQ preserves the proposed 3 – 5 day time requirement in 252:302-2-5-2.d.

RESPONSE: The intent is to simplify the demonstration requirement and potentially save the laboratory the expense of purchasing proficiency testing samples. The lab may either participate in a proficiency testing program or analyze 4 replicates of a known standard over a period of 3-5 days. These would be analyzed as unknowns by the technician performing the demonstration. Either choice requires the lab to adhere to all QC requirements. Two different instruments (brand and model) would require demonstrations for each instrument. DEQ regrets any confusion with the proposed language, and plans to issue a guidance document to supplement the rule revision.

4. COMMENT: OAC 252:302-3-4(5)(d)

APAC-Central, Inc. asked whether a technician at a field lab accredited for “pH” only must perform 4 replicates of a known standard over a period of 3 to 5 days..... or demonstrate satisfactory participation on PT samples. It seems overkill to require 4 replicates over 3 to 5 days for a field lab performing “pH” only. We are already demonstrating satisfactory participation on PT samples and have not failed one since accreditation.

RESPONSE: Please see Response to Comments #3, above.