

Comments from City of Tulsa-OAC 252:306 Appendix A:

State Environmental Laboratory Services

(See attached document)

OAC 252:306 Appendix A

Comment 1: The City of Tulsa (“Tulsa”) requested clarification as to whether a prep test, and its associated fee, applies to every sample or every analyte.

Response: The Prep Test Column in draft Appendix A was retitled "Prep Test Fee." A footnote was added, which states that if a prep test is listed, its associated fee is applied per sample only and not per analyte.

Comment 2: Tulsa requested clarification because Toxic Characteristic Leaching Procedure (TCLP) Method 6010 was listed twice, both in the Metals Section and Prep Test Section, causing confusion for calculating prices.

Response: The line listing "EPA 6010 Toxic Characteristic Leaching Procedure" with the EPA1311 prep text was removed from the Metals table to eliminate the duplication.

Comment 3: 6 PFAS for drinking water compliance are listed in draft Appendix A. Tulsa asked whether the analysis of the 29 PFAS, included in UCMR5 monitoring, will still be offered.

Response: SELSD has completed all requested UCMR5 monitoring samples for PFAS testing. SELSD will only perform PFAS testing using EPA Method 537 for the six (6) drinking water compliance PFAS.

Comment 4: Tulsa asked whether solid matrix PFAS analysis will be offered by SELSD.

Response: SELDS does not anticipate offering PFOA or PFOS testing for non-drinking water compliance.



**COMMENTS ON THE PROPOSED REVISIONS TO TITLE 252
CHAPTER 306 "STATE ENVIRONMENTAL LABORATORY
SERVICES"**

42 OK Reg 328, December 2, 2024

Comments on Appendix A:

1. In the "Metals" fee list, for solid matrix samples by Method 200.7 or 6010, the prep test is listed as Percent Moisture or Percent Solids, respectively. It appears that if multiple metals are requested that each would have its own prep test, and associated fee, rather than one prep test fee applying to the analysis. Clarification on how the prep fees are assessed would be helpful.
2. Toxic Characteristic Leaching Procedure (TCLP) Method 6010 is listed in the "Metals" fee list for \$248, with Prep Test Method 1311 required. TCLP Extraction Method 1311 is listed in "Prep Tests" fee list for \$397. In addition, RCRA 7 and RCRA 8 Metals are listed in "Test List" fee list, \$217 and \$248, respectively. Realizing RCRA 7 and RCRA 8 Metals can be requested for non-TCLP samples, the Test List prices are understandable. However, the apparent duplicate listing of TCLP in "Metals" and "Prep Test" is confusing. It may add clarity if the line item for TCLP Method 6010 is removed from the "Metals" fee list. Method 1311 TCLP Extraction "Prep Test", and the RCRA 7 and RCRA 8 "Test Lists" would remain, and can be selected together for TCLP extraction and analysis.
3. The 6 PFAS for drinking water compliance are listed. Will analysis of the 29 PFAS that were included in UCMR5 monitoring still be offered?
4. Will solid matrix PFAS analysis be offered? With PFOA and PFOS designated as hazard constituents under CERCLA, it can be expected that the need for these analyses in solid matrices (biosolids, drinking water treatment residuals, soils) will increase.