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December 21, 2010

U. S. Environmental Protection Agency
EPA Docket Center (EPA/DC) Water Docket MC 28221T
1200 Pennsylvania Ave.
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OW-2010-0921

The Water Environment Association of Texas (WEAT) appreciates the opportunity to comment on the proposed rule “Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act; Analysis and Sampling Procedures”. WEAT is a non-profit technical and educational organization whose members include scientists, engineers, utility managers, operators, and regulators. Collectively, our members are responsible for the design, operation and maintenance of wastewater collection and treatment and systems all across Texas. We are a state member association of the Water Environment Federation.

WEAT would like to comment on the following sections:

"II B. Changes to 40 CFR 136.3 To Include New Standard Methods and New Versions of Approved Standard Methods

EPA is proposing to revise how we identify approved methods that are published by the Standard Methods Committee. Currently in the tables at 136.3(a), EPA lists these methods in one or more columns as being in the 18th, 19th, 20th printed compendiums, or in the On-line editions published by the Standard Methods Committee. EPA identifies which versions are approved by the printed edition in which the method is published or, in the case of the electronic version of the method, by the last two digits of the year in which the method was published by the Standard Methods Committee (e.g., Standard Method 2320 B-97). In some cases, EPA has approved more than one version of a Standard Method. Approval of several versions of the same Standard

Method has led to inconsistencies in how laboratories conduct these analyses especially in quality assurance/quality control (QA/QC) practices. For this reason, EPA is proposing to approve only the most recent version of a method published by the Standard Methods Committee with as few exceptions as possible by listing only one version of the method with the year of publication designated by the last four digits in the method number (e.g., Standard Method 2320 B–1997). This change allows use of a specific method in any edition that includes a method with the same method number and year of publication."

WEAT's comment: Standard Methods is a compendium of methods with the general QC requirements stated in Part 1000 and section XX20 of each Part. Most organizations are aware that if you are using a method in the 21st edition of Standard Methods, you must follow the Quality Control requirements of the 21st edition. For consistency, most labs utilize the same edition of Standard Methods for all their methods. With switching to the new format, it may be more confusing for labs to determine which quality control procedures they are supposed to follow. The new requirement to use the most recent version of a method is practically forcing labs to subscribe to the on-line edition of Standard Methods as the most recent version of a method is usually on-line years before they are published in hardcopy. The least expensive subscription to on-line Standard Methods is \$404/2years. This will be cost prohibitive for many of the small water and wastewater laboratories.

I. Proposed New Quality Assurance and Quality Control Language at 40 CFR 136.7

WEAT's comment: We believe that minimum frequencies need to be defined for QC checks and a definition for analytical batch and prep batch. If EPA does not want to define the minimum frequencies, prep batch and analytical batch terms, then it should reference an acceptable source that does, such as Standard Methods or the TNI standards. The proposal also states that the quality control checks must be documented in the written method. WEAT suggests that the quality control checks be documented in the written method, Quality System Manual, or other laboratory document. If a laboratory has already defined analytical and prep batches in its Quality Manual, it should not have to define them in every method SOP.

Thank you for the opportunity to provide comments on this proposal. If you have questions or need any additional information, please feel free to contact Ms. Dana White, Chair, WEAT Laboratory Committee, at 512-461-4318.

Sincerely,



Carol Batterton
Executive Director