

Mugan, Tom J

From: Weber, Robert H. (DNR)
Sent: Wednesday, January 09, 2002 11:31 AM
To: DNR_WD_WT_WPDES_PER
Subject: FW: BOD holding time requirement

FYI

Bob Weber

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From: Webb, David (DNR)
Sent: Wednesday, January 09, 2002 11:30 AM
To: Alfredo Sotomayor; Brenda Howald; Camille Johnson; Diane Drinkman; Donald Domencich; Donalea Dinsmore; Gregory Pils; John Condron; Phillip Spranger; Richard Mealy; Ronald Arneson; Susan Watson
Cc: Renville, Joe W; Nyffeler, Robin T; Schuettpelz, Duane H; Weber, Robert H. (DNR)
Subject: BOD holding time requirement

After receiving input from many, and getting analysis and ruling from legal staff, the enforceable holding time for BOD is 48 hours. This may represent a change for some staff and a few facilities, but I believe it's the defensible position until/if codes and laws change.

Method and law are clear and correct to recommend performing analysis as quickly as possible, but the allowable holding time for Wisconsin facilities is 48 hours (post composite period). Emphasis on sample preservation is also in order - if samples are faithfully cooled to 4 C or less, then degradation should be minimized. If you know of facilities that are being held to 24 hours, you may communicate to them that 48 hours is allowable. As you know, Standard Methods is clear that the holding time is 24 hours post composite period, however, the superceding NR 219 allows 48 hours post composite. NR 149 also requires adherence to applicable state or federal law (NR 219) - even though NR 149 also says that ...methods shall be followed... State law is the driving factor.

We should place a piece in the next newsletter, and otherwise take opportunities when they arise to tell people/groups. We could also place a blurb in the what's new section of the LabCert WEB page. Otherwise, we'll phase-in the change (for those to which it's a change) via the audit cycle.

Bob and Duane, please share with appropriate staff.

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