

REPORT OF FINDINGS AND RESPONSES

AUGUST 3, 2011
WWTP OPERATOR WORKSHOP





Division of Public Health Services

Public Health Preparedness Services

Bureau of State Laboratory Services

250 N. 17th Avenue
Phoenix, Arizona 85007-3231
(602) 364-0720
(602) 364-0759 FAX

JANICE K. BREWER, GOVERNOR
WILL HUMBLE, DIRECTOR

May 27, 2011

Mr.
Town of WWTP
, AZ

Dear Mr. :

The Arizona Department of Health Services (Department or ADHS) has been provided the legal authority pursuant to A.R.S. § 36-495.01 to license all environmental laboratories engaged in compliance testing. Pursuant to A.R.S. § 36-495.02(A3), facility can be exempt from licensure if they are "performing only compliance testing of parameters which require analysis at the time of sample collection as long as the testing methodologies employed are approved by the director of the department of health services or the department of environmental quality."

An announced on-site inspection of your facility's compliance testing of wastewater according to ADHS approved methods was conducted on May 19, 2011. Below is our detailed written report of findings provided pursuant to A.R.S. § 41-1009 listing those areas in which was

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1. Exempt Method QA/QC Requirements.

A. [redacted] did not have a Standard Operating Procedure (SOP) for specific conductivity that contained:

- 1) Specifications for reagents and standards.
- 2) A description of the plant’s sample collection process.
- 3) A description of the calibration and standardization process.
- 4) Specific quality control practices, including:

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Dear Mr. Baker:

The following is our response to an on-site inspection conducted by ADHS on May 4, 2011. The Aquifer Protection Permit (101563) requires exempt methods for the analytical testing of pH, and specific conductivity on wastewater discharge and groundwater monitoring. The permit also requires an exempt method for turbidity analyses on reclaimed water. The audit findings will be addressed in the same order in which they were presented in the audit on-site inspection report received May 13th, 2011. This letter will include a corrective action plan and date of completion for each item marked as deficient.

1. **Exempt Method QA/QC Requirements.**

A. [REDACTED] had not chosen an approved ADHS method for pH, turbidity, and specific conductivity compliance testing.

Response: A. [REDACTED] has elected to reference: Standard Methods for the Examination of Wastewater, 20th Edition, 1998, for all exempt methods below.

pH-(SM 4500-H⁺ B)

Turbidity-(SM 2130 B)

Conductivity-(SM-2510B)

Effective 6-1-2011

B. [REDACTED] did not have a Standard Operating Procedure (SOP) for each exempt ADHS approved method reported for compliance which contained:

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ADHS Actions Based On WWTP's Response:

- Send a follow-up letter(s) if response is unclear, unacceptable or missing information; or
- Perform a follow-up inspection later in the Fall of 2011 or Winter of 2012.