Authority and Purpose for PAIs

- Authority
  - Florida Statutes for QA, lab certification, inspections, DEP powers & duties
  - DEP Rule 62-620
  - Federal rules for compliance evaluation programs, conditions for all permits
  - Memorandum of Agreement between EPA and DEP
  - NPDES Compliance Procedures Manual
- Purpose
  - Determine reliability of facility self-monitoring data

Pre-Inspection Planning

- Review facility monitoring requirements
  - Include more than one facility in lab audit, if possible
- Verify lab certification status for methods reported
- Review previous audits
  - Corrective actions for noted deficiencies
  - Potential problem areas in lab
- The lab may or may not receive advance notice of audit
- Plan a concurrent inspection of the permitted facility for the same time period (discuss with program inspectors)

DMR-QA

- What is it?
  - Lab analyzes unknown performance samples and reports results
  - Vendors of samples compile results and report to EPA
    - Some DMR-QA samples are the same as DOH ELCP PT samples
- Who participates?
  - Major dischargers (and others designated by DEP wastewater program)
- Evaluation reports
  - Available from EPA Region 4
  - May be available from vendors per regulator's request
    - Auditor can ask lab for reports at time of audit
  - Source of prep information for PAI lab audits
    - Focus on failed analytes
    - If available for facility, check pH, chlorine and turbidity

Credentials, Purpose and Procedure

- Present credentials to authorized lab representatives
- Explain the purpose and authority for the audit
  - Authority comes from facility permit
- Explain how you'd like the audit to proceed
- Provide a closing conference summarizing deficiencies found
  - Also acknowledge areas of acceptable performance

Audit Items

- Track facility DMR Sample Result Through Lab
  - Sampling Records
    - Sampling & Field-testing Procedures
      - Checklists per DEP SOPs
  - Lab Analysis Records
    - Checklists per certified method
- Laboratory Facilities and Equipment
  - Walk-through
  - Method-specific equipment & instrumentation
- Laboratory Personnel (Interviews)

Describe Reporting Process to Lab

- PAI report provided to the permitted facility with lab report
  - Overall assessment of compliance is rated
- Lab is copied on lab report
- Facility is responsible for corrective actions required for listed lab deficiencies
  - Enforcement is with facility via permit, not the lab

Suggested Evaluations

Satisfactory - No deficiencies were found in the laboratory analytical procedures and documentation.

Minor - Some deficiencies were identified in the laboratory records and/or analytical procedures with no impact or minimal impact on data quality. The problems were not chronic.

Marginal - Chronic problems were found in the laboratory analytical procedures and/or records. The deficiencies impacted the data provided to the client.

Unsatisfactory - There are several reasons for an unsatisfactory rating:

- The laboratory did not follow the DEP approved analytical method.
- The laboratory did not have records of analyses.
- Records were falsified.
- Chronic deficiencies severely impacted the data submitted to the client.

Examples & Resources

- Audit Checklists
  - QAO Resources page
  - DEP district examples
  - EPA examples
- Audit Reports (district examples)
- DMR-QA Reports (examples)
- PAI Typical Records Request List (QAO Resources page)
- NETI website (inspector training aids)
- EPA NPDES Compliance Inspection Manual