MI Laboratory Certification Program Oct-2018 through Sep-2019 Federal Funding Utilized – PWSS Grant, DWSRF set-aside funds	
State Contact	Amy Lachance, <u>lachancea1@michigan.gov</u> , 616-490-9590
EPA Region 5 Contact	Frank Lagunas, <u>lagunas.frank@epa</u> .gov, (312) 886-4466
Expectations	In order to maintain primacy, the States must comply with 40 CFR141.20, which includes the following provisions: 142.10(b)(3)(i) and 142.10(b)(4).
	All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 C.F.R. parts 141 and 142.
	EPA recommends that the State has a process for ensuring capacity to analyze at the Principal State Lab or commercial labs, all National Primary Drinking Water Regulations (NPDWR) parameters that are required to be sampled in the State.
	It is recommended that MDEQ discuss with the State Lab the possibility of adding language to the State rule to require a private lab to report analyses to State, and to add a requirement in the State Lab certification program to require private labs to report a positive to the State.
	Through the Lab Certification program, it is recommended that MDEQ discuss with the State Lab the possibility of adding language to the contract between the private lab and system to allow private lab to contact State to report a positive.
	Radiological parameters are analyzed by commercial certified laboratories approved by the State.
Region 5 Assistance	EPA's "Microbial Laboratory Guidance Manual for the Final LT2ESWTR" is available online at: https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=2000UDF3.txt
Discrepancies	MDEQ's drinking water program is in needs of a Lab-to-State data management application.
Self-Assessment and Evaluation	MDEQ updated its QMP in Dec 2017, and it is currently up-to-date.
	Excerpt from EPA's FY 2015/FY 2016 End-of-Year Evaluation Report of Michigan's Lab Certification program, dated December 18, 2017:

The State is expected to maintain: (1) certification for the principal State laboratory, (2) a certification program to certify commercial laboratories within the State, and (3) a process for ensuring capacity to analyze at the principal State laboratory or commercial laboratories all parameters that are required to be sampled in the State. Laboratory certification responsibilities in Michigan are undertaken by the MDEQ Laboratory, and radiological parameters are analyzed by commercial certified laboratories approved by the State. MDEQ agrees to ensure all laboratories that produce results for compliance with the SDWA are recertified at least once every three years and will meet all requirements of 40 CFR parts 141 and 142.

The most recent on-site review of the Michigan Laboratory and Laboratory Certification Program Review was conducted in 2016; the final report was issued September 29, 2017, and the MDEQ Laboratory was granted full certification for chemical and microbiological analyses.

Michigan DEQ has been developing eDWR, a data system that will report data from private laboratories to the State. However, new releases of SDWIS-State changed how eDWR worked, and the State lacked resources to keep up with the continuing updates to SDWIS-State versions.

EPA Region 5 has strongly encouraged MDEQ to focus IT resources on a Lab-to-State data management application. Since a large portion of the NCWS sample data from private laboratories are still being handentered by LHD staff and some CWS staff, the State wants to take full advantage of EPA's Compliance Monitoring Data Portal (CMDP), which was released in fall of 2016. The State could fold CMDP implementation into its SDWIS-Prime transition activities. Implementation of a Lab-to-State application, such as CMDP, would ensure that MDEQ and the LHDs will be notified more quickly of hold time exceedances, so there will be more opportunity to notify the water supply in order to obtain a replacement sample before the monitoring period ends. Also, a Lab-to-State application will improve the timeliness issue of State's receipt of private laboratories' results, of reporting positive results to the State promptly, and improve data quality.

Relevant Attachments









