



Department of Public Health and Human Services

Director's Office ♦ PO Box 4210 ♦ Helena, MT 59620 ♦ (406) 444-5622 ♦ Fax: (406) 444-1970
<https://dphhs.mt.gov>

Greg Gianforte, Governor

Charles T. Brereton, Director

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Montana's Certified Water Testing Laboratories,

Montana Department of Environmental Quality has expressed some concerns regarding a lack of adherence to analytical method protocols. As in all states, Montana requires the method requirements for preservation to be followed for laboratory certification when analyzing regulatory samples for Drinking Water Method compliance. These method protocols are not guidelines. They are regulatory procedures that must be followed exactly, unless there is another EPA document that clarifies the method requirements. If any part of the method protocol is not followed as written, Montana Department of Environmental Quality will not accept the results for compliance.

Reminders:

- “There must be strict adherence to correct sampling procedures, including sample handling, sample identification, and sample transport times when required by the method.” (Manual for Certification of Laboratories Analyzing Drinking Water, 5th edition, Chapter IV, Section 6.4 Sample Collection and Transport).
- If the testing laboratory is not responsible for sample collection and transport, the laboratory must first verify that the paperwork, preservatives, containers, and holding times are all correct and within established parameters as required by the methods. **If not, the sample(s) needs to be rejected, recollected, and submitted appropriately.** See “Manual for Certification of Laboratories Analyzing Drinking Water, 5th edition, Chapter IV, Section 6.4 Sample Collection and Transport” for more information.
- Sample temperatures must be noted upon receipt and must fall within the acceptable range. The only exception is when samples are collected and submitted from a public water system in close proximity to the testing laboratory. Under these circumstances, the samples may not have had time to reach the appropriate temperature by the time of receipt and may be considered acceptable, but **ONLY** if packaged appropriately on ice or with frozen gel/ice packs. (Supplement 1 to the Fifth Edition of the Manual for Certification of Laboratories Analyzing Drinking Water, Page 6, Chemistry Sample Collection, Supplement to: Chapter IV Critical Elements for Chemistry 6. Sample Collection, Handling, and Preservation)
- When a sample is rejected, rejection criteria should be documented in writing (EPA Order 5360.1).
- If a sample is received and does not meet the method requirements, the client should be notified and a resample should be requested. If the client requests the analysis to proceed, the results should be reported to DEQ with the compliance indicator = “N”.
- We are aware there are a couple of EPA documents that allow sample temperatures other than those contained in the method. When using these alternate preservation temperatures, we require that

laboratories reference the EPA document in their SOP for traceability. The reference must be to an EPA approved document or supplement to the method.

Unfortunately, failure to follow any part of the regulatory methods can affect the laboratory's analytical results, risk certification, and ultimately provide inaccurate information to the customer. Accurate data is the foundation of our work to protect public health. Without this trust, we cannot be assured of public health protection.

The State of Montana Environmental Laboratory partners to maintain the Department of Environmental Quality primacy over the drinking water regulations on behalf of laboratories, business, and public water supplies in Montana. In 2023, the State of Montana's Environmental Laboratory will be completing an in-depth inspection of certified laboratories, along with an audit of records, to protect public health and safety.

If you have additional questions, please contact the State of Montana's Environmental Laboratory at 1(800) 821-7284, option 2. A copy of this letter is posted to our website <https://dphhs.mt.gov/publichealth/LaboratoryServices/WaterLaboratoryCertificationProgram>.

Thank you,



Russell Leu
Environmental Laboratory Supervisor
Rleu2@mt.gov
1(800) 821-7284, option 2