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The proposed revisions to Section 252.302 (a) and (b) (relating to qualifications of the laboratory supervisor) should include a provision for substitution of years of experience for college credit hours. The stringent educational requirement of 24 chemistry credits for organics and metals supervisors automatically disqualifies personnel with, for example, 23 chemistry credits but 15 years of experience in these fields of analysis and creates a significant hardship for laboratories in qualification of personnel.

The proposed revisions to Section 252.302 (c) (relating to qualifications of the laboratory supervisor) to include more stringent educational requirements for Microbiology supervisors are unnecessary. Current microbiological assays do not require an in depth knowledge of microbiological theories to demonstrate proficiency, therefore, supervisors engaged in microbiological or biological analysis should not be required to have 4 credits in Microbiology. The supervisor requirements for microbiological analysis should remain unchanged.

The proposed editorial changes to Section 252.307, subsection (j) should include a provision allowing laboratories to utilize currently published material for sample handling, collection and preservation procedures (i.e., EPA's Quick Guide to Drinking Water Sample Collection) in lieu of developing their own.

The proposed revisions to Section 252.401 (f), subsection (i) should be clarified to specifically define "sample" as to distinguish "sample" from "bottle". The verification of **chemical preservation per sample bottle** is reasonable as specific analyses require differing types of chemical preservation. However, the verification of **thermal preservation per sample bottle** is not as logical as all sample bottles are collected and stored on ice (if required) and remain on ice for the same duration until received by the laboratory. The proposed revision to Section 252.401 (f), subsection (i) should allow for the verification of **thermal preservation per sample** (i.e., all sample bottles collected and recorded on the same chain of custody) and the verification of **chemical preservation per sample bottle**.

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