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November 25, 2014

Mr David Berwanger
CT Laboratories
1230 Lange Ct
Baraboo WI 53913

Subject: Acceptable Performance for Low Concentration PCBs in Fox River sediment Samples by –
SOP SV-020 – Revised

Dear Mr. Berwanger:

Thank you for providing the updated SOP SV-020 for PCB determinations in sediment using a microwave extraction. The revisions address the concern expressed in the October 16, 2014 letter about interpreting chromatograms when multiple Aroclor patterns may be present. In our communications about the SOP, I noted that sample holding times may be extended by freezing samples and that projects may include provisions for archiving samples for later analyses. Much of the work done on Fox River sediments has an approved Quality Assurance Project Plan (QAPP) or equivalent documentation with provisions related to extended holding times and data qualifiers. As your laboratory begins accepting sediment samples from the Fox River, please be aware of relevant QAPP provisions that may affect your procedures.

Wisconsin DNR recognizes that CT Laboratories, Inc. has demonstrated acceptable method performance to analyze lower concentration Fox River sediment samples using their SOP SV-020. WDNR provided a set of proficiency (PE) samples in support of a US Army Corps of Engineers (USACE) dredging project in the Fox River and as such, the set of PE samples provided were limited to the concentration range that might be encountered in USACE project. Analysis of additional PEs will be necessary to demonstrate acceptable performance for samples in more contaminated areas of the river.

It's important to note that the results submitted using the Soxhlet extraction did not meet performance criteria. We understand that the laboratory's procedure did not include air drying the samples. SV-020 includes air drying and employs a microwave extraction technique rather than Soxhlet. The laboratory needs to demonstrate acceptable performance for any method modifications incorporating alternate sample processing or analysis steps to SV-020.

Demonstrating acceptable performance on Fox River proficiency samples does not guarantee that project samples will be sent to your laboratory nor does it override data quality elements contained in project-specific quality assurance project plans (QAPPs). The Fox River Oversight Team and companies responsible for contracting for sample analyses may conduct project audits as part of their quality assurance responsibilities.

Sincerely,

Donalea Dinsmore
Quality Assurance Coordinator, Office of the Great Lakes

cc: Steve Geis, Laboratory Certification SS/7