

**Harrison, Scott A**

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**From:** Harrison, Scott A  
**Sent:** Friday, April 30, 2010 10:35 AM  
**To:** Moore, Luanne A  
**Cc:** Rinehart, Rebecca; Addison, Mikeal E; Alterwein, Daniel A; Gonzalez, Ismael XO  
**Subject:** FW: Further Guidance/SOCs  
**Attachments:** Contaminant Group - Data Rejection and Monitoring Triggers.pdf

Luanne:

Here is the guidance we received from the DEP regarding the SOC MDL being greater than the RDL.

The attached DEP guidance still stands with the following clarification:

If the SOC sample is reported as BDL and the MDL is < 1/2 the MCL, even if the result is over the RDL, the sample is considered a nondetect and will be entered as zero into PWS.

Let me know if you have any questions.

Sincerely,

Scott

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**From:** Study, Kenna [mailto:Kenna.Study@dep.state.fl.us]  
**Sent:** Friday, April 30, 2010 10:25 AM  
**To:** Owens, Michele; Dodson, Ron  
**Cc:** Harrison, Scott A; Lassiter, Laura; Hoofnagle, Van  
**Subject:** RE: Further Guidance/SOCs

I checked with Van and the guidance stands. If the sample reported is BDL and the MDL is < 1/2 MCL, even if over the RDL, the sample is a nondetect and entered as zero into PWS. Please enter the MDL that was reported in the 'D.LIMIT' column on the sample screen.

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**From:** Owens, Michele  
**Sent:** Tuesday, April 20, 2010 8:36 AM  
**To:** Study, Kenna; Dodson, Ron  
**Cc:** Scott Harrison DOH; Lassiter, Laura  
**Subject:** RE: Further Guidance/SOCs

Maybe I am misunderstanding something here, but when I went to the bulletin board and read that item, it seems to be reiterating the policy which allows us to accept SOC results if the MDL is greater than the RDL, as long as it's less than ½ the MCL. I thought your responses below were saying that labs must now meet the RDLs or we reject the data. If the guidance is still in effect, then we need clarification regarding Scott's original question of how to determine "if the sample result is > than the RDL when the MDL is greater than the RDL". Or do we just assume that any parameter with an MDL of >RDL is a detect which triggers quarterly sampling?

Thanks,  
MO

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**From:** Study, Kenna  
**Sent:** Monday, April 19, 2010 4:06 PM  
**To:** Dodson, Ron; Owens, Michele  
**Cc:** Scott Harrison DOH; Lassiter, Laura  
**Subject:** RE: Further Guidance/SOCs

If you query the bulletin board for %SOC% it will be the second item listed.

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**From:** Dodson, Ron  
**Sent:** Monday, April 19, 2010 4:03 PM  
**To:** Owens, Michele; Study, Kenna  
**Cc:** Scott Harrison DOH  
**Subject:** RE: Further Guidance

No, that guidance was superceded by the RDLs. You can find those RDLs listed by contaminant in 550.

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**From:** Owens, Michele  
**Sent:** Monday, April 19, 2010 4:02 PM  
**To:** Study, Kenna; Dodson, Ron  
**Cc:** Scott Harrison DOH  
**Subject:** FW: Further Guidance

Kenna/Ron,

Is this guidance regarding SOC analyses that don't meet the RDL still in effect? I thought I vaguely remembered something about this being kind of a transitional thing, to allow the labs time to be able to meet the RDLs. Some of these MDLs are substantially greater than the RDLs, although all are less than ½ the MCL.

Thanks,  
Michele

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**From:** Scott\_Harrison@doh.state.fl.us [mailto:Scott\_Harrison@doh.state.fl.us]  
**Sent:** Friday, April 16, 2010 4:41 PM  
**To:** Owens, Michele  
**Subject:** RE: Further Guidance

Michele:

I have attached a copy of some SOC results we received along with the guidance we received from the DEP regarding MDL's over the RDL.

As you can see by the lab results, several of the compounds have MDL's greater than the RDL.

The guidance for SOC's says that we can only reject the data if the lab MDL > 1/2 MCL but we can require quarterly monitoring for the compound if the sample result is > the RDL.

However, how can we tell if the sample result is > than the RDL when the MDL is greater than the RDL.

How should we handle this situation?

Your guidance is greatly appreciated.

Sincerely,

Scott

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