

Comment Info: =====

General Comment: The estimates for the amount of time it takes a wastewater facility to do DMRQA is understated, in my opinion. At our plant, operators ARE the lab staff, we don't have a chemist that does our work.

Specifically:

The packet takes my boss about 30 minutes to read- for me, 30-45 minutes Planning for the study, because I have to work the extra lab samples with everything else I do at the plant, takes me a couple of hours, especially when I have to track down the samples from a provider, get cost estimates and deal with our municipal purchasing rules.

It takes me more than 2 hours to run the samples- all I do is BOD, ammonia, phosphorus, TSS and chlorine. Residual chlorine is always so high so it takes lots

of dilutions, best guess is a half-day, if not more.

We don't have clerical staff- our clerk makes copies and does the filing, I do all the

forms and stuff like that, and it takes more than 12 minutes- more like an hour to

get it together and ready to send out.

I also keep all the lab files in the lab- if it was at the clerk's office and I had an

inspection I wouldn't be able to get it because the clerk is only part-time.

I'm not sure about your labor costs either, I don't make \$56/hour including benefits

and our clerk don't make much over \$10/hr.

How come you don't include costs for samples- they cost me almost 300 bucks every year, more like \$550 if I do the qc samples with them as a check like the providers suggest you do.

The other thing I don't like about this is having to do them on your schedule, summer is the busiest season for us, and the boss don't like overtime for lab work.

Why don't we do this in the winter, when things aren't as hectic, or just let us do

them sometime between January and October (so then you'd get the results by the end of year)?