

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
AMENDMENTS TO PRIMARY) R14-09
DRINKING WATER STANDARDS:) (Rulemaking- Water)
35 Ill. Adm. Code 611.490)

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board Illinois Environmental Protection Agency's TESTIMONY OF SCOTT D. SIDERS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
Joanne M. Olson
Assistant Counsel
Division of Legal Counsel

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
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AMENDMENTS TO PRIMARY) R14-09
) (Rulemaking- Water)
DRINKING WATER STANDARDS:)
35 Ill. Adm. Code 611.490)

TESTIMONY OF SCOTT D. SIDERS

My name is Scott Siders and I am a Laboratory Accreditation Officer within the Illinois EPA (IEPA), Division of Laboratories' Environmental Laboratory Accreditation Program. I have over thirty years of related experience, with twenty-four years of service with the IEPA, Division of Laboratories in various capacities (see attached resume). Prior duties at the IEPA included: Contract Laboratory Program Administrator and Divisional Quality Assurance Officer. I have been a Laboratory Accreditation Officer since 2004. As a Laboratory Accreditation Officer, I have responsibility for all aspects of laboratory accreditation.

The IEPA is a National Environmental Laboratory Accreditation Program (NELAP)-Recognized Accrediting Body and certifies environmental testing laboratories for chemical analyses done not only under the SDWA but also the CWA and RCRA. Under NELAP, the IEPA provides both primary (in-state) and secondary (out-of-state) certifications. Primary certified laboratories are audited by the IEPA and also required to analyze proficiency testing samples. The IEPA grants secondary certification based on recognition of the out-of-state laboratory's primary certification granted by another state NELAP-Recognized Accrediting Body. There are thirty-one primary certified laboratories within Illinois and fifty secondary certified laboratories outside of Illinois. Of the thirty-one primary certified laboratories, twenty are certified for drinking water testing. The IEPA only offers certification for chemical (i.e.,

inorganic, organic and asbestos) methods and analytes and does not offer any certification for radiochemistry or microbiology.

Until recently, radiochemistry certification was done by the Illinois Emergency Management Agency (IEMA) and USEPA Region V. IEMA no longer offers certification for radiochemistry, and USEPA Region V has significantly reduced its certification program. Microbiology certification is done by the Illinois Department of Public Health (IDPH). The IDPH is also preparing to offer certification for Cryptosporidium in drinking water, but does not yet offer this certification. Under the proposed amendments, the IEPA would be able to accept sample results from laboratories certified by other primacy states for radiochemistry or Cryptosporidium if no laboratories have an Illinois certification.

The proposed changes to Section 611.490 temporarily solves IEPA's dilemma it now faces in lacking Illinois certified laboratories for all SDWA contaminants. The proposed changes to Section 611.490 present the most logical and efficient programmatic and regulatory means to address the problem of no certification being offered by the IEMA, or IEPA for radiochemistry. To add radiochemistry certification at the IEPA would require an expansion of what we offer certification for under NELAP, proposing changes to IL Admin. Codes Part 185 (Laboratory Accreditation Fees) and Part 186 (Accreditation of Laboratories); developing new procedures and documents; and to attend training for radiochemistry laboratory certification. These changes take time, and the proposed amendments give the Illinois EPA the necessary time to decide how best to move forward.

The proposed amendments would allow the Agency to accept radiochemistry test results from laboratories that are already certified by other states (e.g., NELAP states) or the USEPA when those accreditation programs are deemed substantially equivalent to the standards used by

the IL ELAP. Many of the IEPA certified laboratories that perform chemical analyses for the SDWA would, in my opinion, also benefit from this proposal since they to depend on having the ability to subcontract any radiochemistry testing needed by a Public Water Supply client in Illinois to a certified laboratory. The IEPA strongly supports the proposed changes to Section 611.490. Thank you for allowing for me to testify.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: Scott D. Siders
Scott D. Siders

DATED: _____

Illinois Environmental Protection Agency
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THIS FILING IS SUBMITTED ON RECYCLED PAPER

RESUME

Scott D. Siders

ADDRESS: 740 S. Mallard Way **HOME PHONE:** (217) 496-2737
Sherman, IL 62684 **HOME E-MAIL:** siders6six@yahoo.com

EDUCATION: University of Illinois at Springfield
Environmental Studies Program
Completed 63 Hours of Graduate Level Course Work

Millikin University
Bachelor of Arts - May 1979
Major: Biology Minor: Chemistry

EXPERIENCE: Laboratory Quality Specialist II
Illinois Environmental Protection Agency (IEPA)
October 1991 to Present
IEPA Desk Phone: (217) 785-5163
IEPA E-mail: scott.siders@illinois.gov

Senior Scientist
Roy F. Weston, Inc.
August 1991 to October 1991

Quality Assurance Manager and CLP Project Manager
IEA, Inc.
September 1989 to May 1991

Quality Programs Administrator
WMX - EML, Inc.
February 1989 to September 1989

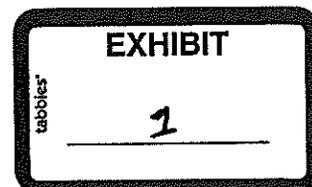
Marketing Representative
Envirodyne Engineers, Inc.
May 1988 to January 1989

Environmental Scientist
U.S. Environmental Protection Agency
June 1987 to May 1988

Environmental Protection Specialist III
Illinois Environmental Protection Agency
September 1984 to June 1987

Chemist
Northern Laboratories, Inc.
June 1984 to August 1984

Chemist
Illinois Power Company
October 1979 to January 1982



DESCRIPTION OF EXPERIENCE (Scott D. Siders):

Illinois EPA - Laboratory Quality Specialist II:

Returned, in 1991, to the Agency as a **LQS I** and promoted to an **LQS II**. Since January 2004, function as a **Laboratory Accreditation Officer**. Manage and perform all aspects of the accreditation process (e.g., process applications, monitor PT performance, on-site assessments, review of laboratory data, report findings, address laboratories' issues and questions, review corrective actions, provide technical and quality assistance, utilize accreditation database) for over 30 laboratories. As a Laboratory Accreditation Officer, I have completed over one hundred forty NELAP on-site laboratory assessments and supervised an "assessor in training" during six on-site assessments.

Additionally, I served from Sept. 1995 until May 2001, on the National Environmental Laboratory Accreditation Conference's (NELAC) Quality Systems Standing Committee. I was selected May 2000, to be the **Chair of the NELAC Quality Systems Committee**. I also served as **Chair of the NELAC PBMS Subcommittee** until July 2002. Elected in 2003 and served until 2006 on the **NELAC Board of Directors**. Currently, I am a member of **The NELAC Institute's (TNI) NELAP Accreditation Council** which administers NELAP. I have been Illinois' representative on the TNI NELAP Accreditation Council since its formation in 2006. Additionally, I was nominated and elected, in April 2012, to serve a three-year term on the **TNI Board of Directors**. The TNI Board of Directors: supervises, controls, and directs the affairs of TNI; determine its policies; and actively pursues its mission.

Prior to my role as Laboratory Accreditation Officer, I served for thirteen years as the **Divisional Quality Assurance Officer** and as the **Quality Coordinator** for the Division of Laboratories (DOL). I coordinated the development and implementation of the state-wide quality assurance (QA) program for the DOL (i.e., drinking water, wastewater, solid waste, air, toxicology and microbiological testing). **Served as Chairperson of the Quality Assurance Committee and coordinated the activities of each Laboratory Quality Assurance Officer**. Responsibilities included development of strategies and plans to improve the DOL's quality assurance program. Further, involved in drafting division-wide standard operating procedures (SOPs) and developing good laboratory practices. Had lead assessor or specific role in DOL quality system audits, data integrity audits, USEPA drinking water and NELAP accreditation of the DOL, corrective actions, customer complaints, QA and data integrity training of staff, Quality Management Plan and Quality Assurance Program Plan development, and all other division-wide quality system related activities. Provided technical advice to various Agency programs including the DoD Federal Sites Unit on field and laboratory quality systems and methodology. I functioned as the **Team Leader of the DOL's NELAC/GALP Implementation Quality Project Team**. Additionally, served as a charter member of the **Illinois EPA's Quality Systems Committee** during which time, I co-authored and coordinated development of the Illinois EPA's first and second Agency-wide Quality Management Plans (QMP).

Served on the Editorial Advisory Board of the **Environmental Laboratory Washington Report** and the **Environmental Testing & Analysis** magazine. Have been an invited speaker on NELAC, EPA Method Update Rule, quality systems, PBMS and ISO/IEC 17025 at national and state conferences (i.e., Pittcon 99, EPA's 19th Annual National Conference on Managing Environmental Quality Systems, 15th Annual Society of Quality Assurance Meeting, USEPA's 20th Annual National Conference on Managing Environmental Quality Systems, WTQA 2001 and numerous Illinois Water Environment Association conferences). Presented paper on laboratory ethics and detecting unacceptable data integrity practices at USEPA Region V's Interpreting Laboratory Data Training Workshop.

As the **DOL's Quality Coordinator** for Total Quality Management (TQM), I coordinated the implementation of TQM and worked with divisional senior managers on TQM strategy. Designed, coordinated, and facilitated DOL's Laboratory/Section Level Continuous Improvement Initiative. Served on the DOL Quality Coordinating Council and facilitate divisional strategic planning meetings. Further, I served on the DOL's Strategic Planning Team and various Customer Relations Action Planning Teams. Monitored DOL quality action teams (QATs) progress and provided assistance as necessary. I also provided internal consultation and training on the use of TQM tools to DOL facilitators and employees.

Facilitated twelve in-house TQM training sessions, and facilitated with USEPA a TQM training session for Michigan Department of Natural Resources. Completed five-day USEPA/ODI, Inc. **Facilitator** training course and other training courses on TQM skills and tools (e.g. USEPA TQM Basic Course, and seven Management Planning Tools). Have spoken on behalf of the Agency at meetings and a conference, on the subject of TQM at the Illinois EPA. Facilitated for the IEPA-Bureau of Land a QAT on improving the groundwater data management process. I have facilitated numerous DOL management meetings. Facilitated DOD/USEPA/IEPA Pollution Prevention Partnership meetings.

I was assigned by Agency senior management to serve as **Agency Interim Quality Coordinator** for first 15 months of Agency-wide TQM implementation. In this role, I was directly involved in the initial development of Agency-wide TQM and non-TQM related training programs. I attended Agency Quality Coordinator meetings and worked on Agency-wide TQM implementation issues. Additionally, I coordinated Agency-wide TQM training, participative management seminar series, facilitator meetings, and Agency Recognition Ceremonies. Further, I provided direct assistance to Agency senior managers who were on the Agency

Page Two

Description of Experience (Scott D. Siders)

Quality Coordinating Council. For these efforts, I received from the Director Mary Gade the Agency's Certificate of Commendations for my efforts as Agency Interim Quality Coordinator.

Served as the **Laboratory Specialist** on the Lithuanian Team for the USEPA & US AID sponsored Baltic Republics Environmental Monitoring Project. As Laboratory Specialist on the team, I evaluated the laboratories of the Lithuanian Environmental Protection Ministry, and presented verbal and written reports to Ministry Staff for improving the practices and capabilities of the Ministry's laboratories. Reports detailed observations made and provided specific recommendations. The project's final report was issued February 1995 as USEPA document EPA 905-R-95-005.

Roy F. Weston - Senior Scientist

Performed technical review of Superfund and RCRA Quality Assurance Project Plans (QAPjPs) as part of the Weston's Environmental Services Assistance Team (ESAT) contract with the USEPA. Reviewed QAPjPs and appendices to QAPjPs, then submitted detailed write-up on review to USEPA ESD-QA Section senior personnel. Further, received training to review USEPA Contract Laboratory Program (CLP) organic data packages per the ESAT SOP. Reviewed USEPA CLP organic data packages after completing the training.

IEA, Inc. - Quality Assurance Manager and CLP Senior Project Manager

As the laboratory's **Quality Assurance Manager**, I develop the laboratories' Quality Assurance Program through the initiation of Standard Operating Procedures (SOPs) and quality assurance related good laboratory practices. Specifically, in the areas of corrective action, internal data validation, control charting, internal audits, and chain-of-custody. Revised the laboratories' Quality Assurance Plan, and established quality assurance policies as needed. I maintained and coordinated all laboratory certifications and external audits. Additionally, **supervised the Project Manager Group** for DoE and USEPA CLP clients. Reviewed CLP data and monitored CLP workload and reporting efforts. Liaison with clients on matters concerning quality assurance and CLP workload. Lastly, assisted Laboratory Director and Sales Representatives with sales and marketing activities.

WMX/EML, Inc. - Quality Programs Administrator

Supervised staff of five Quality Program Coordinators, each responsible for a laboratory or support area. Coordinated EMLs quality assurance activities, assured compliance with procedures, policies and developed the Quality Assurance Plan. Conducted internal audits of laboratories, computer services, and management. Developed with staff the goals for further development of Quality Assurance Program. Helped bring to resolution difficult corrective actions. Monitored and updated control chart data and limits to detect problems or the need for corrective actions. Served as acting Quality Program Coordinator for the Chemical Methods and Robotics Laboratory. Provided assistance to Chemical Waste Management, Inc. staff with audits of CWM laboratories.

Envirodyne Engineers, Inc. – Marketing/Sales Representative

Conducted marketing and sales activities for engineering firm and its analytical laboratory. Reported directly to Vice President. Performed marketing research and contacted potential industrial and environmental consulting clients in the greater Chicago market area. This was a new geographic market area for Envirodyne's analytical laboratory. Handled sales process from initial contacts to sales calls. Would provide technical assistance to clients as requested. Made numerous sales presentations and represented firm at trade shows. Had numerous sales with a few resulting in large dollar value contracts (i.e., \$40K per month). I also assisted engineers with hazardous waste management and real estate site assessment sales activities.

U.S. Environmental Protection Agency - Environmental Scientist

Served as a **Project Officer** and **Deputy Project Officer** within the Office of Emergency and Remedial Response (Superfund) - Analytical Operations Branch. As a Project Officer performed technical and administrative oversight of various contracts that were in support of the Superfund Program. Had lead responsibility for CLP Sample Management Office (i.e., Special Analytical Services and Contract Compliance Screening), ESAT Headquarters Team, and Superfund Bottle Repository contracts. Was **Co-chairperson of the CLP Data Review Workgroup**, which revised and streamlined the **CLP Functional Guidelines for Data Validation and Useability**. Attended USEPA's Project Officer and Data Quality Objectives training courses.

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Description of Experience (Scott D. Siders)

Illinois Environmental Protection Agency - Environmental Protection Specialist III

Joined Agency as an **EPS I** and was promoted on two occasions. **EPS III** was final payroll title. While an **EPS**, I performed the following duties. Managed the Illinois Contract Laboratory Program and administered the Laboratory Certification Program. As the **Contract Laboratory Officer**, I managed seven analytical contracts worth over 2.4 million dollars in state fiscal year 84. Developed CLP Statement of Work, conducted bidding process, evaluated contractor performance through audits and CLP data review and managed the program's budget. Monitored program workload and costs. Further, reviewed and approved CLP Quality Assurance Project Plans. Reported on CLP status to Agency senior management. Communicated daily with contract laboratories on technical issues and provided them direction. Functioned as a technical advisor to the Bureau of Land on analytical, field quality assurance and monitoring. Reviewed numerous Quality Assurance Project Plans for state and federal Superfund site activities.

As **Drinking Water Laboratory Certification Officer**, I administered the Agency's Drinking Water Laboratory Certification Program. This involved review of technical questionnaires, and performance audit data. Further, I conducted audits of laboratories seeking certification. Issued reports to laboratories indicating deficiencies that required correction prior to certification. Handled questions from IEPA staff on methodology and QA/QC for various regulatory programs.

Northern Laboratories, Inc. - Chemist

As a **Chemist**, I performed bench studies to determine effectiveness of fluoride and ammonia reduction chemicals for use at a wastewater treatment facility. Performed chemical analyses, which included: atomic absorption by flame and graphite furnace, cyanide, phenol, and boron.

Illinois Power Company - Chemist

As a **Chemist** at the Illinois Power's Central Laboratory, I performed CWA NPDES inorganic chemical, bacterial analyses and tested transformer oils. Analyses included: atomic absorption, ion chromatography, gas chromatography (PCBs), TOC, and other gravimetric, titrimetric, and colorimetric methods. Operated a sewage treatment plant and a wastewater treatment facility at IP's Clinton Nuclear Power Station. Conducted quarterly field testing and sampling of streams, lakes, and monitoring wells.

CERTIFICATE OF SERVICE

Joanne M. Olson, Assistant Counsel for the Illinois EPA, herein certifies that she has served a copy of the foregoing NOTICE OF FILING and TESTIMONY OF SCOTT D. SIDERS upon persons listed on the Service List by mailing, unless otherwise noted on the Service List, a true copy thereof in an envelope duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois on October 21, 2013.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
Joanne M. Olson
Assistant Counsel
Division of Legal Counsel

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Michael Mccambridge
Hearing Officer
Illinois Pollution Control Board ·
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Chicago, Illinois 60601