

Laboratory Analysis and Reporting Rules *2018 Revisions*



Michael W. Deal

Compliance Assurance Section

Division of Drinking And Ground Waters

Overview

- OAC 3745-89-08
- Exceptions
- Subcontract reporting
- Reporting and Analysis timeline
- eDWR
- SMP IDs
- Web Resources



Why Reporting Deadlines?

- Results can trigger requirements for PWS
- Incorrect violations of monitoring requirements
- Public Right to Know (including non-detects)
- Seasonal PWS need TC- to open doors
- Resampling within the monitoring period

Ohio Administrative Code

Rule 3745-89-08 Analysis and Reporting

- Initial effective date 10/1/1995
- Covers who, what, when, and how of reporting analytical results
- Previous version required different reporting deadlines for chemical and microbiological results
- Ohio HAB Rules added reporting deadlines for cyanotoxins
- Ohio House Bill 512 placed requirements for lead and copper samples
- Comprehensive overhaul in 2017/2018 to modernize and synchronize reporting deadlines.

OAC 3745-89-08 Revisions

Analysis

- Complete analysis (including QC) within 30 business days of receipt of sample
 - If method or rule hold time allows
- 60 business days for radiologicals

OAC 3745-89-08 Revisions

Reporting

- All chem and micro reported by the 10th day following completion of analysis (including QC) unless next business day requirement
- New next business day requirement;
 - detections of microcystins in raw water
 - all Pb & Cu results
 - seasonal startup total coliform results.

Results Required Next Business Day

Analyte/Result	New or Existing Requirement
Positive total coliform result	Existing
Positive Escherichia coli result	Existing
Repeat total coliform result	Existing
Repeat Escherichia coli result	Existing
<u>Seasonal startup microbiological result</u>	<u>New</u>
Maximum contaminant level exceedance (all analytes)	Existing
Resample to confirm MCL	Existing
Detection of total microcystins in finished water	Existing
<u>Detection of total microcystins in raw water</u>	<u>New</u>
Detection of cylindrospermopsin gene	Existing
Detection of saxitoxin gene	Existing
Detection of anatoxin-a gene	Existing
<u>All lead tap water results</u>	<u>New</u>
<u>All copper tap water results</u>	<u>New</u>

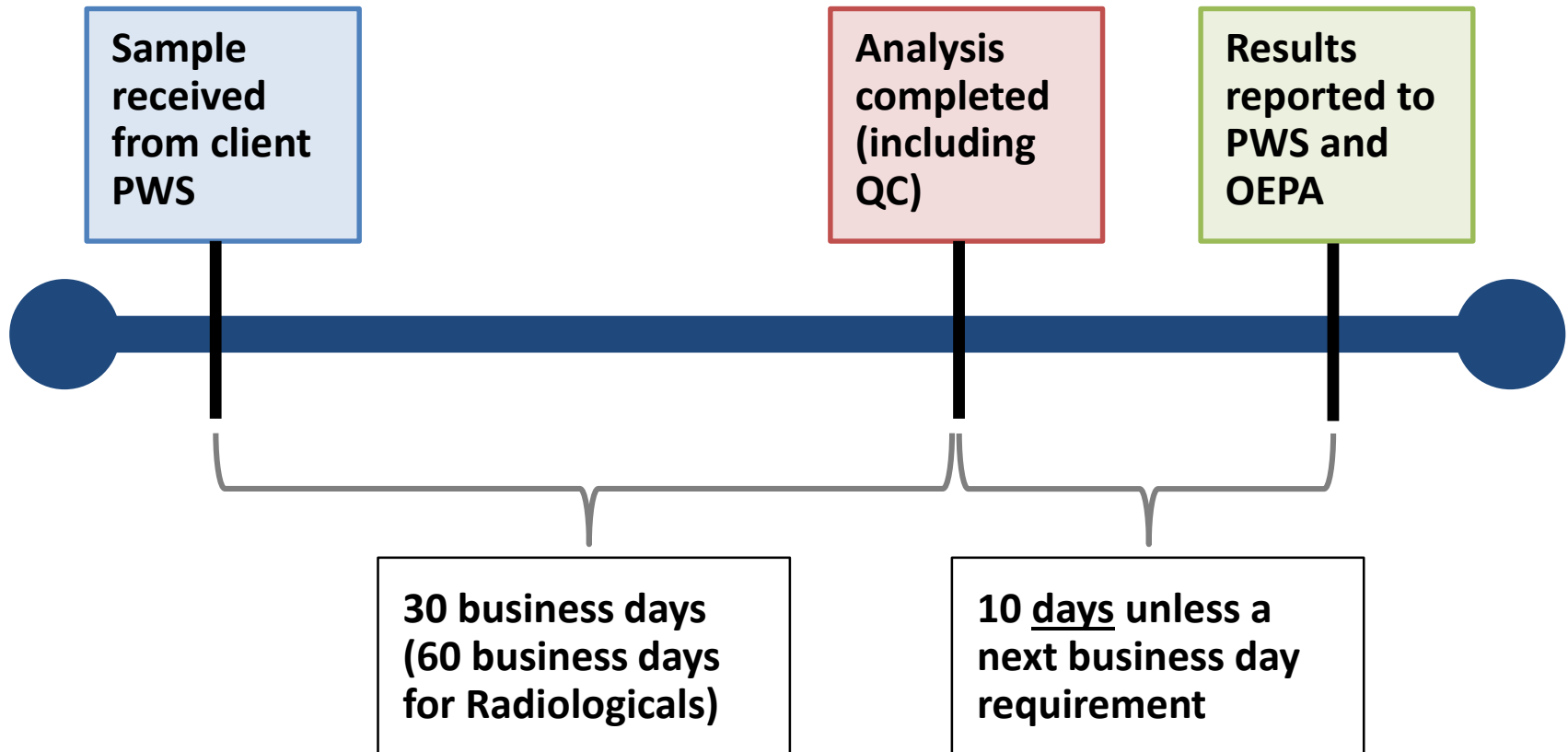
Exceptions

- Monthly Operating Reports (MORs)
 - Unchanged
 - Due 10 days after the end of each month (OAC 3745-81-75)
- Water Quality Parameters
 - Updated with lead and copper rules (OAC 3745-81-90)
 - Due 10 days after the month when sample results were received by PWS.

Subcontract Reporting

- Subcontracted samples must meet 30 business days to completed analysis requirement (final QC)
- Must meet hold time in rule or method
 - e.g. microcystins 5 day from collection hold time in rule (OAC 3745-90-04)
- Contract lab is ultimately responsible for reporting quality and timeliness

Analysis and Reporting Timeline



General Reporting Tips

- Reporting tips document
- Reporting SOP for staff absences
- Ohio EPA review of COC and SOP
- Call Ohio EPA with questions
- Complete info from PWS client
- “When in doubt report it out”

eDWR Submission Problems

- A problem with one sample can reject an entire submission
- When an entire submission rejects, click the red X to be shown what is causing the submission to reject



- Tyler Liston will send an email explaining how to fix the issue if it has not already been resubmitted

eDWR Common Reasons for Report Rejection

- Invalid facility code/sample monitoring point pairing
- Analysis dates before the collection date
- Invalid method
- Invalid PWS ID code

eDWR Report Corrections

- If the issue is caught quickly (i.e. within 30 minutes) you can resubmit but email Tyler Liston a notification to not load the earlier submission
- If the submission has already been loaded to our database:
 - Send an email to Tyler Liston with the sample number and what needs to be changed

Sample Monitoring Point IDs (SMP IDs)

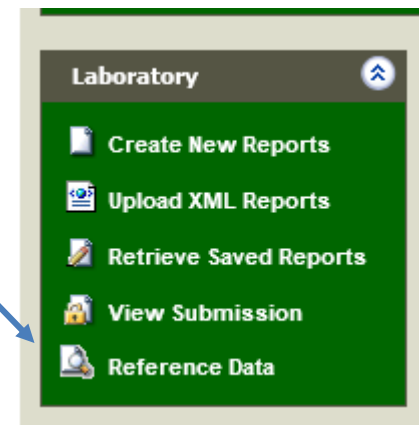
- Location of sample collection
- Paired with facility IDs
- Identify specific location (address) for distribution system samples
- Reference a PWS's SMP IDs in various locations
 - Monitoring schedule
 - eDWR reference data
 - FAC ID and SMP ID spreadsheet

SMP IDs for Lead and Copper Samples

- Unique locations identified for lead and copper monitoring using alpha numeric codes (LC###)
- Associated with specific addresses (or building location) including contact information
- Submitted on a spreadsheet to Ohio EPA
- Updated by PWS as changes occur (SMP IDs don't transfer to new sites)

SMP IDs for Lead and Copper Samples

- Check COC for SMP IDs when receiving samples
- Repeat SMP ID in “Collection Address” field
- Check for PWSs’ SMP IDs in eDWR or website
 - eDWR Reference Data
- Add new sites as DS000 with address, contact info, and LC### in comments



Web Resources

- DDAGW Data Reporting page
 - <http://www.epa.state.oh.us/ddagw/reporting>
 - Laboratory Reporting Tips
 - Rule Update Fact Sheet
 - Forms and Instructions (FAC ID and SMP ID spreadsheet)
 - Data Received

Web Resources

- DDAGW Public Water System page
 - <http://www.epa.state.oh.us/ddagw/pws>
 - PWS Monitoring Schedules
 - Apparent Violations
 - Program contacts
 - Current Advisories
 - Drinking Water Watch

Web Resources

- eMessage Subscriptions
 - <https://ohioepa.custhelp.com/>
- Ohio EPA YouTube Page
 - <https://www.youtube.com/user/PIC1049>

Questions



- 💧 www.epa.ohio.gov/ddagw
- 💧 michael.deal@epa.ohio.gov
- 💧 tyler.liston@epa.ohio.gov