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Drinking Water Section

DWS Circular Letter #2020-83

TO: Community and Non-Transient Non-Community Public Water Systems and Directors of

Certified Laboratories

FROM: Lori Mathieu, Branch Chief, Environmental Health and Drinking Water Branch

DATE: December 9, 2020

RE: Sampling Point and Analytical Method Reporting Requirements

The Connecticut Department of Public Health Drinking Water Section is providing this important reminder to improve the quality of compliance monitoring data submitted to the Department.

Sampling Point Reporting

The Lead and Copper Rule and the Revised Total Coliform Rule require public water systems to develop written sample siting plans that identify sampling sites in the distribution system that are appropriate for each rule. Samples collected for compliance must be collected from sample sites identified in the sampling plans. Historically, in order to reduce data entry burden and assist laboratories transitioning to electronic reporting, a generic sampling location (Sampling Point ID: 4) was used to represent samples collected in the distribution system. In 2020, approximately 9% of the samples collected in the distribution system for Community and Non-Transient Non-Community public water systems were reported with a generic sampling location (Sampling Point ID: 4). In order for the Drinking Water Section (DWS) to verify that samples are collected in accordance with a water system's sampling plan, the use of the generic sampling location (Sampling Point ID: 4) will be phased out.

Therefore, all distribution samples reported for compliance after February 1, 2021 (for Community and Non-Transient Non-Community water systems) must include the actual sample location rather than the "generic" distribution sampling location (Sampling Point ID: 4).

An inventory of sampling locations for each water system can be found on the Water Quality Monitoring Schedules that are posted on the <u>DWS website</u>. The DWS is aware that not all water systems have sampling plans on file with the Department and will be directly reaching out to these individual water systems to request updated sampling plans. After February 1, 2021, distribution system samples reported with the generic sampling location (Sampling Point ID: 4) or not in accordance with the system's sampling plans





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will not be used for compliance which may result in monitoring and reporting violations. Transient public water systems will be phased in on a future timetable.

Analytical Method Reporting

The Federal Safe Drinking Water Act and the Regulations of Connecticut State Agencies specify that all samples collected for regulatory compliance must be analyzed with approved analytical methods specific to the parameter being tested. In order to confirm that samples are properly analyzed in accordance with the regulations and can be used for compliance, the analytical method used to analyze each analyte must be reported with the results.

All samples reported for compliance after February 1, 2021 must include the Analytical Method used to analyze each parameter reported.

A list of analytes and analytical method pairings is available in the Reference Materials section of the Department's <u>Electronic Reporting Requirements for Water Quality Data</u> webpage. Failure to report this information after February 1, 2021 may result in samples not being accepted for compliance resulting in monitoring and reporting violations.

Compliance Monitoring Data Portal (CMDP)

The DWS discontinued the use of the old EDI reporting format and protocols and planned to have all existing EDI reporters transitioned to the CMDP no later than **June 30, 2017**. There are still a few remaining laboratories and water systems that have yet to fully transition to the CMDP. The DWS will be reaching out directly to these reporters to complete the transition process. CMDP users can take full advantage of all the benefits provided by the application, such as:

- Four methods of reporting for labs and public water systems of all sizes
 - o XML File Upload
 - o Online Data Entry Forms
 - o Offline Excel Templates
 - Web Services
- Safe, secure and certified transfer of compliance data to the DWS
- Instant feedback regarding reporting errors
- Online confirmation that results were successfully received
- Pre-Production (testing) and Production environments available to all users
- 24-hour CMDP access
- A complete list of water system distribution sampling locations available for reporting
- A complete list of analytes and Standard Method pairings

Please contact Robert Baran in the Drinking Water Section at <u>drinking.water@ct.gov</u> with questions or concerns regarding these reporting requirements or transitioning to the CMDP.

c: Heather Aaron, MPH, LNHA – Deputy Commissioner Department of Public Health Certified Operators