




MEMORANDUM

TO: All Alaska Drinking Water
Certified Laboratories

DATE: August 20, 2019 (replaces November
17, 2017 edition)

FROM: Patryce McKinney, MBA 
Drinking Water Certification Authority

SUBJECT: DW Reporting Timelines
Clarification

This memo is to clarify reporting timelines required by Alaska certified drinking water laboratories, found in Title 18 of the Alaska Administrative Code Chapter 80 (<http://dec.alaska.gov/commish/regulations/pdfs/18-aac-80.pdf>) Section 355 (18 AAC 80.355).

As stated both in the regulation and in the current policy memo "Reporting Requirements-Acute Contaminants" issued on August 20, 2019, ALL acute contaminant tests performed from a Public Water System (PWS), (total coliform, *E. coli*, and Nitrate) must be electronically reported to the Department of Environmental Conservation (DEC) within the required timeframes set in 18 AAC 80.355. The memo also points out that "Withholding data leads to misinformation or incomplete information to determine PWS compliance and ensure public safety."

Acute contaminant results for all purposes and non-acute contaminant results for compliance purposes are reported into CMDP according to 18 AAC 80.355. Delays that do not change or affect the data integrity are **unacceptable**, and include, but are not limited to: 1) intentional delay of sample data review or reporting; or 2) results held pending client action such as payment.

The timeframe for reporting all results electronically to DEC is found in 18 AAC 80.355(a), except in the case of a nitrate exceedance, a positive coliform result, or a repeat coliform result, in which case 18 AAC 80.355(b) applies with the additional preliminary notifications. There are two conditions in paragraph (a); the requirement is seven days following the month of whichever condition is shorter:

- 1) The month in which results are received. For this citation, the results are considered received when the data integrity has been established (e.g. result, hold time, and data QC have been verified) and the data is ready to be reported.; or
- 2) The end of the required monitoring period. The required monitoring period for each test can be obtained from the PWS's Monitoring Summary, available on Drinking Water Watch (<https://dec.alaska.gov/DWW/>).

It is the onus of the laboratory to ensure results for all samples and tests are submitted according to regulation. It is a laboratory's choice to determine how they will meet these requirements. If a laboratory has a procedure to report data into CMDP by work order or sample delivery group, then the submission should occur by the result with the shortest deadline. For example, using the end of the monitoring period, a work order submitted from a system whose monitoring summary has a quarterly SOC and an annual DBP2, the work order deadline would be the SOC deadline as the more stringent deadline.

The lab may choose to separate the two monitoring summary deadlines by creating separate work orders for SOC and DBP2 from the same submission. Otherwise, if the lab's procedure is for individual samples or tests to be loaded into CMDP, that procedure should include the lab's plan to ensure the results are submitted on time per regulation.

It cannot be stressed enough that timely reporting is paramount. Public health and validity of drinking water quality may be eroded by delay.

All electronic submissions to the Alaska Department of Environmental Conservation must comply with this memo. If there are any questions regarding the timely reporting of drinking water samples, please contact the LCP at (907) 375-8200 or declabcert@alaska.gov.

Thank you.