



April 3, 2020

RE: Flexibility allowances for drinking water compliance samples during COVID19 Pandemic

Dear Certified Drinking Water Laboratory,

On March 26, 2020 the EPA Office of Enforcement and Compliance Assurance (OECA) issued a memorandum: COVID19 Implications for EPA's Enforcement and Compliance Assurance. This memorandum provides guidelines for primacy agencies relating to public water systems and certified drinking water laboratories. The State of Alaska Drinking Water Program (DWP) will follow these guidelines in developing policy relating to drinking water compliance samples. Our highest priority is to protect against microbial pathogens and other acute contaminants, such as nitrate. Under this memorandum, we can offer the following flexibility:

- Total Coliform Bacteria compliance samples
 - For PWS that are on the 48 hour waiver list, samples will be accepted up to 48 hours from the time of collection.
 - For PWS that are not on the 48 hour waiver list, samples will be accepted up to 30 hours from the time of collection. If the certified laboratory believes there are extenuating circumstances that prevent the sample from being analyzed within 30 hours, please contact the Drinking Water Program at 451-2138 to discuss an exception.
- Long Term 2 Surface Water Treatment Rule (LT2) samples
 - Sample hold time is 30 hours from the time of collection but the primacy agency may grant an extension up to 48 hours on a case by case basis. Please contact the Drinking Water Program at 451-2138 to request an extension if there are extenuating circumstances.
- Fecal Coliform samples
 - Samples that cannot be analyzed within 8 hours of sample collection, can be analyzed using the LT2 Colilert MPN Method and should be analyzed within 48 hours.
- HPC analysis for pool/spa samples
 - Samples should be analyzed within 30 hours of sample collection.

The memorandum also allows the primacy agency to offer flexibility for some chemical analyses. Sample holding times cannot be extended for chemical analyses. The following flexibility will be granted:

- Compliance samples for chemical analyses (Nitrate, Arsenic and VOC) for systems required to conduct quarterly monitoring will be accepted outside of the monitoring period.
- Compliance samples for Disinfection By-Products will be accepted outside of the monitoring period. This will apply to systems that monitor quarterly, annually or every three years as follows:
 - For systems on quarterly monitoring samples will be accepted outside of the month specified, but within the required quarter
 - For systems on annual routine monitoring (required to collect a sample within a specified month of the quarter) samples will be accepted both outside the month specified and outside the specified quarter
 - For systems on reduced annual or every three year monitoring (required to collect within a specified quarter) samples will be accepted outside the specified quarter

The Drinking Water Program is committed to allowing the maximum amount of flexibility as we all deal with the COVID19 Pandemic. If you have any questions, please contact Cindy Christian with the Drinking Water Program at 451-2138 or at cindy.christian@alaska.gov.

Sincerely,

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