MEMORANDUM

TO: All Alaska Drinking Water Chemistry Certified Laboratories
FROM: Patryce McKinney, MBA
Drinking Water Certification Authority

DATE: November 16, 2017
SUBJECT: Xylene and PCB Reporting

The Alaska Drinking Water Laboratory Certification Program (LCP) has become aware of an issue regarding laboratory reporting to the Alaska Electronic Data Reporting System (EDRS).

Laboratories are required to report data to EDRS according to their current certified Scope of Accreditation. EDRS programming has previously allowed the reporting of individual Xylene and PCB analytes (e.g. o-Xylene, Aroclor 1221, Aroclor 1232) instead of requiring the analyte totals for PCB and Total Xylenes. This practice has resulted in the totals values, which are the only parameters of interest to the Drinking Water Program, not being reported, thus triggering violations for impacted public water systems (PWSs). For these analytes, EDRS has been updated to only allow entry of the Total values and not the individual analytes.

It is acceptable, but not required, for individual analytes to be included in the laboratory report document, along with the Totals values, but only the Totals values can be reported to and accepted by EDRS. "Total Xylenes" and "PCBs" are approved by EPA as analytes in 40 CFR 141.24 and in Appendix A to Subpart C, but the individual components of these are not approved and are thus outside the purview of Alaska Drinking Water laboratory certification and not applicable to PWS monitoring requirements in Alaska.

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