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## Laboratory Guidance for Stage 2 Disinfectant/Disinfection By-Products Rule (DBP2)

In order to meet the requirements for routine monitoring established in the Stage 2 Disinfectant/Disinfection By-Products Rule (DBP2), changes have been made to the Department of Environmental Conservation's (DEC) policy regarding acceptable data for DBP, including total trihalomethanes (TTHM) and haloacetic acids (HAA5) results. This guidance is to inform laboratories of the change so that they may adjust their policies and procedures accordingly. DEC wishes to mitigate laboratories expending valuable resources to accept and analyze samples from Public Water Systems (PWS) that cannot be used for compliance, and will be rejected by the DEC Drinking Water program.

On October 1, 2013, the majority of PWS in Alaska began routine monitoring under the Stage 2 Disinfectant/Disinfection By-Products Rule (DBP2). The rule is very specific about the location(s) and time period(s) that samples need to be taken. Since compliance with the rule is determined using a locational running annual average, only sample results from an exact sample location can be used to meet compliance requirements. In addition, samples must be taken in the month of highest DBP (TTHM and HAA5) values as designated in the system's DBP2 Compliance Monitoring Plan.

There are essentially three sampling schedules. Systems monitoring annually must sample in the same month every year, the month designated in their sampling plan. For systems that are on reduced annual monitoring, the sample(s) are allowed to be collected within a particular quarter each year. For systems that monitor quarterly, the month of highest DBP values is used to set what month in each quarter samples are to be taken, whether it's the 1<sup>st</sup>, 2<sup>nd</sup>, or 3<sup>rd</sup> month of each quarter. For example, a system monitoring quarterly whose month of highest DBP values is November, would be required to take their samples in the 2<sup>nd</sup> month of each calendar quarter. Please note this is a simplified example since many systems are required to monitor at multiple locations, and the samples may be required in different months in a year or quarter. The important part is that acceptable samples are done at designated locations and within time periods established in the Compliance Monitoring Plan or Monitoring Summary.

In addition to understanding what the Compliance Monitoring Plan requires, it is very important to be aware that the exact sample location from the sampling plan must be recorded onto the chain of custody by the PWS or designated agent, and that the laboratory must submit the exact sample location provided for the sample to DEC via the Electronic Data Reporting System (EDRS).

## **Laboratory Guidance for Stage 2 Disinfectant/Disinfection By-Products Rule (DPB2)**

Although the responsibility for adherence to the Compliance Monitoring Plan lies with the PWS or their designated agents, some laboratories provide detailed sample instruction, consultation, and/or sampling services, which may need to be updated in response to this policy change.

Additionally, there is a potential for significant expense incurred by the laboratory for sample kits rejected on receipt or payment delays/disputes over rejected data.

Only samples that are taken at the correct location and in the correct month according to the PWS's Compliance Monitoring Plan will be accepted by DEC. Samples that are taken at a location different than those noted in the sampling plan or in a month different than the plan will be rejected by DEC. Compliance Monitoring Plans for each PWS can be obtained online from Drinking Water Watch at <http://dec.alaska.gov:8080/DWW/>. However, these will not all be updated until April 1, 2014.

Understanding that laboratories may not know the requirement for each PWS's Compliance Monitoring Plan, laboratories are encouraged to work with each PWS, their designated agent, or to contact the Drinking Water program office directly for this information.

If the laboratory is uncertain as to the acceptability of the submitted sample in regards to the collection date or sample location, it is advisable and encouraged that laboratories call the DEC Drinking Water program. Calling the Drinking Water program will ensure that viable samples are not rejected in error at the laboratory, or that laboratory resources are not expended on samples which will be rejected by the Drinking Water program.

In order to provide additional information regarding these changes, the DEC Drinking Water program is preparing webinar training for laboratories that will be held in December 2013. If you are interested in the training, please provide a good contact name and email for your laboratory to Marci Irwin at [Marci.Irwin@alaska.gov](mailto:Marci.Irwin@alaska.gov), by December 6, 2013.

Please contact a local DEC Drinking Water program office, if you have questions regarding this policy.

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Information regarding the Drinking Water Laboratory Certification program can be found at <http://dec.alaska.gov/eh/lab/index.htm>, email at [declabcert@alaska.gov](mailto:declabcert@alaska.gov), or call 1-907-375-8200.