



## Laboratory Analysis and Reporting Rule Updates

*Highlights of the 2018 Certified Drinking Water Laboratory Analysis and Reporting Rule changes from Ohio Administrative Code (OAC) Rule 3745-89-08 and 3745-81-90.*

### Analysis Rules

The timely and accurate analysis of drinking water samples for public water systems has major implications to public health and consumers' right-to-know. Ohio EPA has updated the reporting rules in OAC 3745-89-08 to include deadlines for the completion of analyses of drinking water samples. Certified laboratories must complete analysis, including quality control, no later than 30 business days after receipt of samples (60 business days for radiological samples). This requirement is meant to provide a deadline for analyses with extended hold times. Any shorter hold time limitations in rule or method must be followed.

### Reporting Rules

Certified laboratories must submit public water system drinking water data to the Division of Drinking and Ground Waters using electronic Drinking Water Reports (eDWR). OAC Rule 3745-89-08 provides specific requirements for timely reporting. Previous versions of the rule specified different reporting deadlines for different contaminant groups. Recent rule updates now require all chemical and microbiological results to be reported to Ohio EPA and to public water systems by the 10<sup>th</sup> day following completion of analysis (including QC) unless next business day reporting is required. Revisions to next business day reporting requirements include the addition of detections of total microcystins in raw water samples, all lead and copper tap water results, and all startup microbiological sample results for seasonal public water systems. These additions append the current next business day reporting requirements already in rule.

### Next Business Day Reporting Requirements

| Analyte/Result                                      | New or Existing Requirement |
|---|-----------------------------|
| Positive total coliform result                      | Existing                    |
| Positive Escherichia coli result                    | Existing                    |
| Repeat total coliform result                        | Existing                    |
| Repeat Escherichia coli result                      | Existing                    |
| Seasonal startup microbiological result             | New                         |
| Maximum contaminant level exceedance (all analytes) | Existing                    |
| Resample to confirm MCL                             | Existing                    |
| Detection of total microcystins in finished water   | Existing                    |
| Detection of total microcystins in raw water        | New                         |
| Detection of cylindrospermopsin gene                | Existing                    |
| Detection of saxitoxin gene                         | Existing                    |
| Detection of anatoxin-a gene                        | Existing                    |
| All lead tap water results                          | New                         |
| All copper tap water results                        | New                         |

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### Monthly Operating Reports and Water Quality Parameters

Monthly Operating Reports (MORs) and Water Quality Parameter (WQP) reports are exempt from the rule changes in OAC Rule 3745-89-08. Reporting deadlines for MORs remain unchanged with the 2018 rule changes. MORs remain due 10 days after the end of each month the public water system serves water to the public as required in OAC Rule 3745-81-75. WQP reporting deadlines as part of the lead and copper program are not affected by the changes in OAC Rule 3745-89-08 but have been revised based on changes to OAC Rule 3745-81-90. WQP results, including those collected after installation of corrosion control treatment, after the Director has specified WQP values for optimal corrosion control, and those WQP collected in addition to minimum requirements, must be reported to Ohio EPA within 10 days after the month in which a public water system receives sample results.

### Effective Date — Oct. 1, 2018

All revisions to OAC Rule 3745-89-08 have a delayed effective date of Oct. 1, 2018. Changes to the WQP reporting requirements were effective May 1, 2018.

### Contact

For more information, contact DDAGW front desk (614) 644-2752 and ask for the Compliance and Assurance section.