

Instructions for Completion Request to Report Qualified Drinking Water Sample Results - Chemistry

The Department's Bureau of Safe Drinking Water ("BSDW") manages the Pennsylvania Drinking Water Information System ("PADWIS"). PADWIS is the electronic storage system for all drinking water compliance data generated for the Commonwealth of Pennsylvania. Environmental laboratories report drinking water compliance data to PADWIS through the Department's Drinking Water Electronic Reporting System ("DWELR"). The Department's Laboratory Accreditation Program ("LAP") manages and oversees the accreditation program for environmental laboratories generating SDWA compliance data for the Department. In accordance with the Federal and State Safe Drinking Water Acts ("SDWA"), the Department's regulations mandate that all SDWA compliance data be generated by PA-DEP accredited laboratories and in accordance with all regulatory, method, and permit requirements.

It is expected that SDWA compliance results reported to DWELR meet all regulatory and method acceptance criteria, and that reported data are not associated with sample collection, preservation, analysis, or quality control ("QC") failures. In addition, DWELR and PADWIS do not have a mechanism to accept data qualifiers. The Department understands that in select and specific situations qualified data might be considered valid for compliance purposes, and the Department has developed a mechanism for laboratories to request to report qualified data to PADWIS. **This system should be used as a LAST RESORT and only when the results could be considered valid.** Laboratories cannot use this system to avoid corrective action, instrument maintenance, re-calibration, re-analysis, re-collection, etc.

Before You Submit Your Request:

The Department will only approve data that can be legally defended as valid SDWA compliance results. The laboratory supervisor should review all requests before submission to the Department and make a good-faith effort to determine if the results might be considered valid and must provide a justification to the Department explaining why he or she believes the data should be accepted by the Department. If you cannot provide a valid justification for why the data should be accepted, DO NOT submit the request.

The Department will **NOT** accept any data associated with any of the following situations:

- Unacceptable Initial Calibration
- Sample analysis or preparation performed out-of-hold
- Samples collected in inappropriate containers or with unacceptable preservation
- Failure of QC with high bias and sample results above the minimum quantitation limit
- Failure of QC with low bias (including surrogates) and sample results below the MCL or action level
- Sample analysis performed by a laboratory that does not hold accreditation with the PA-DEP

For Matrix Spike Failures (assuming acceptable results for all other QC measures):

- Inorganic Testing: The laboratory must re-prepare the matrix spike sample and analyze the re-prepared sample. If the second analysis indicates matrix interference then the laboratory may submit the Request Form.
- Organic Testing: The laboratory must verify that any surrogates and/or internal standards are within method acceptance criteria for the particular sample and matrix spike. If the surrogates, internal standards, and all other sample acceptance criteria are acceptable, then the laboratory may submit the Request Form.
- DO NOT submit the form requesting to report matrix interference if you have not performed the steps above.

Completion of the Request Form:

A laboratory seeking to obtain permission from the Department to report qualified SDWA compliance results must complete the Request Form. Complete the Request Form as follows:

- Print or type all information.
- Complete ALL items on the form, including the pH and residual chlorine measurements. Even if the samples do not require pH preservation or removal of residual chlorine, the Department still requires this information to determine if the sample might be considered valid.
- Do not include ambiguous information, such as requesting to report results as "<RL". The laboratory must provide an actual numerical result and units of measurement, such as "<0.005 mg/L".
- Use one form per batch of samples analyzed by the same method that demonstrate the same QC failure type.
- For requests that encompass more than one analyte and/or more than one sample, provide the specific information for each analyte (analyte name and results, including units) that are referenced to the specific laboratory sample ID number on a separate sheet.
- An approved laboratory supervisor or QA Officer must sign and date the form.

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Required Attachments:

In addition to the Request Form, the laboratory must provide the following attachments:

- **Sample and QC Summary:** The laboratory must provide a summary of the sample and batch specific QC information for each analyte and QC measure associated with the analytical test performed. The information provided by the laboratory should not be copies of the analytical data (instrument print-outs). The information that must be submitted should be a short summary, possibly in a table form that contains at least the following information, depending on the required QC:
 - Initial Calibration Range, including concentration of the calibration standards.
 - True Value and % recovery of the QC measure (including but not limited to LCS, MRL check, CCVs, ICVs, etc.)
 - Performance of the results of the Matrix Spikes, Duplicates, Method Blank(s), Surrogate(s), and Internal Standard(s)
- **Copy of the Chain of Custody** or other sample receiving documentation utilized by the laboratory to verify and document sample collection and receipt information. If samples were received as a subcontracted work agreement, the receiving laboratory must indicate to which laboratory the samples were originally submitted.
- **Investigations into the Failure:** Describe the investigations undertaken by the laboratory to determine the cause of the failure, also known as a root cause investigation.
- **Corrective Actions Resulting from the Failure:** Explain the corrective actions, if any, that are or will be implemented to avoid this failure in the future.
- **Justification:** Provide an explanation or justification as to **WHY** you believe the data is valid and the Department should accept the qualified sample results for drinking water compliance. This justification must directly relate to the validity of the data in question and cannot relate to a monitoring period, inability to recollect a sample, etc.
- **Other Comments or Information:** Provide any additional comments or information that you feel the Department will need to make the decision.

NOTE: Please attempt to limit the amount of documentation that you provide to the Department. The required attachments should not result in more than one page per document. If your submission is longer than 5-10 pages please contact your accreditation officer to ensure that you are providing the correct information.

Submission of the Request Form:

The Request Form and attachments must be provided to the general e-mail account for the Department's Laboratory Accreditation Program at eplabaccredit@pa.gov. Please submit one request form and required attachments in a single e-mail submission.

Use the following format in the e-mail subject line for single sample submissions:

DEP Laboratory ID#, Method Name, Laboratory's Sample ID#
For example: 68-01234, EPA 505, 546899

Use the following format in the e-mail subject line for multiple sample submissions:

DEP Laboratory ID#, Method Name, Date of Analysis (# of Samples in the Request)
For example: 68-01234, EPA 505, 5-15-2015 (12)

Evaluation of the Request Form:

The LAP will review the submission and coordinate with the BSDW to make a final decision. The LAP will notify you if the submission requires additional information, documentation, or correction. Failure to provide the requested documentation or submission of inaccurate information will delay the processing of the request. The LAP will notify the laboratory of the Department's final decision via e-mail to the e-mail address(s) that are included on the original submission. Questions regarding completion and submission of the Request Form should be directed to the laboratory's accreditation officer or to the Laboratory Accreditation Program at (717) 346-7200 or eplabaccredit@pa.gov.

DO NOT report any SDWA compliance data associated with unacceptable sample collection, handling, quality control, etc. without approval from the Department.