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EPA REGION 8 DRINKING WATER PROGRAM

WYOMING AND TRIBAL WATER SYSTEMS

FEBRUARY 2025 NEWSLETTER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

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INSIDE THIS ISSUE

AFTER HOURS EMERGENCY PHONE NUMBER

EPA R8 DRINKING WATER WEBSITE

NEW U.S. EPA REGION 8 FAX NUMBER

NEW DRINKING WATER PROGRAM MEMBERS

CHANGE FORM REQUIREMENTS

AC PIPE MANAGEMENT

IMPORTANT REMINDERS FOR CHEMS, RADS, ETC.

NEW PFAS REGULATION

SEASONAL SYSTEMS SHUTDOWN BEST PRACTICES

REVISED RTCR REQUIREMENTS REPORT

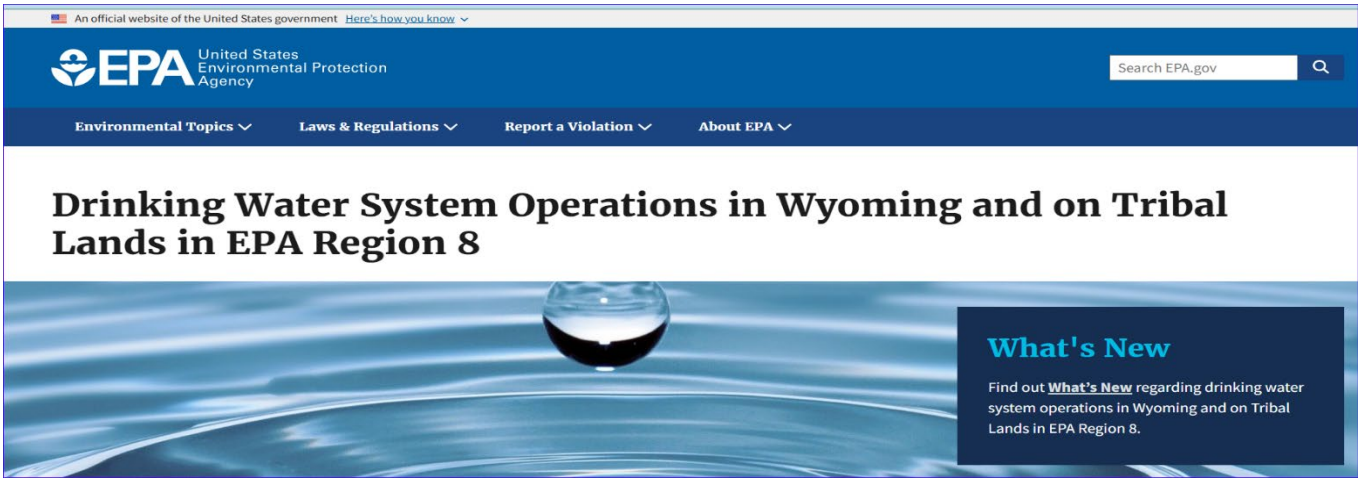
SUMMER SAMPLING SHIPPING PRACTICES

AFTER-HOURS EMERGENCY PHONE NUMBER

The Region 8 Drinking Water Program has an after-hours emergency phone number. If you experience an emergency during non-workday hours or the weekend, such as an issue that disrupts your water supply or the water is contaminated with *E coli* bacteria or other contaminants, please call 303-312-6327 for assistance. During Monday through Friday working hours, please contact one of our staff members for assistance.

EPA DRINKING WATER WEBSITE

Are you aware of the EPA Drinking Water Website? www.epa.gov/region8-waterops



EPA's Website for Drinking Water Resources

EPA Region 8 has a website for drinking water system operations in Wyoming and on Tribal lands containing many resources you may need or find helpful. The website is divided into six sections: (1) Drinking Water Programs, (2) Emergency Preparedness, (3) Reporting Results, (4) Regulations and Compliance, (5) Monitoring and Sampling, and (6) Operations and Assistance.

Some key resources by section include the following:

Drinking Water Programs

- Drinking Water Watch, the tool that enables you to:
  - View water quality data the EPA has received
  - Generate a report to help you develop your annual Consumer Confidence Report

Emergency Preparedness

- Measures to take if you have pressure loss

- Boil water advisory template when an *Escherichia coli* (*E. coli*) maximum contaminant level (MCL) exceedance occurs
- Follow-up actions for total coliform positive or *E. coli* positive results
- Planning for natural disasters and improved security

Reporting Results

- Forms to report changes to water source, treatment, water system facilities, system contacts and/or management, as well as seasonal operations
- Public notice information
- Consumer confidence report resources
- Templates for emergency response planning and lead and copper tap sample site plans, and forms for maximum residual disinfectant level and sanitary surveys

Regulations and Compliance

- EPA's regulated analytes list
- Tips to stay in compliance
- Lead service line inventory requirements

Monitoring and Sampling

- List of certified laboratories
- Sample collection guide

Operations and Assistance

- Preparing for a sanitary survey and tech tips
- Training presentations
- Funding sources.

Our **staff contact list** is available in the yellow **"Need Help"** box on the right-hand side of the home screen.

Need Help?

Contact List for EPA Region 8's Drinking Water Branch

NEW U.S. EPA REGION 8 FAX NUMBER

New U.S. EPA Region 8 Fax Number

The new fax number, **effective January 20, 2025, is 303-312-7517**. Please update your systems with the new number; you will not receive an error message if you send a fax to the old fax number. While our new fax number is 303-312-7517, we encourage you to use the R8DWU@epa.gov email for faster and efficient communication. Please include a proper subject line to ensure your email reaches the right team.

THE NEWEST MEMBERS OF REGION 8'S DRINKING WATER PROGRAM

Ándrea (Ándie) Trujillo Guajardo

We are thrilled to announce Ándie Trujillo Guajardo as the new Partnerships and Data Section Supervisor in Region 8's Safe Drinking Water Branch, replacing Judy Bloom, who retired in early January. Ándie comes to our Branch with significant leadership and water experience. Ándie (pronounced *on dee*) started with the EPA in 2021 as a Tribal Program Manager in the Tribal Affairs Branch, and most recently served as the Acting Supervisor of the Community Engagement Section. She is a dedicated and certified nonprofit, project management, engineering, and organizational development professional.

Prior to joining the EPA, Ándie was Founder and President of an engineering consulting firm, Rural Project Services, with offices in Antonito and Lakewood, Colorado. Responsible for providing access to capital projects in rural communities, she was successful at bringing renewable distributed energy generation online, providing access to safe drinking water, and discharging clean water for communities through capital projects.

Ándie is a graduate of the University of Colorado at Denver's School of Public Affairs with a Master of Public Administration, and the Colorado School of Mines with a Bachelor of Science with a Mechanical Engineering Specialty. She lives in Lakewood, Colorado, with family. Outside of work, Ándie loves to dance ballet folklórico, hike, hunt, and connect with the natural environment.

Pragati Sharma

Pragati backfilled behind Bailey as the Manager of the Nitrate Rule & Consumer Confidence Report. Since Kim Le's retirement earlier this year, she is the Acting Radionuclides Rule Manager. Pragati joined us in March 2024. Pragati comes to us with over 18 years of experience in the wastewater arena conducting inspections, permitting facilities, implementing regulations, and providing compliance assistance. She implemented the Industrial Pretreatment Program for a large wastewater utility where she managed three units tasked with Permitting, Compliance & Enforcement, and Sector Control. The work included full facility characterization, permit development and issuance, compliance assistance and enforcement and maintaining an industrial survey (list of industries in the utility's service area) and controlling discharges from different sectors in the utility's service area. Additionally, she has led organization-wide interdepartmental and small team projects. She has also led process improvement projects focused on eliminating duplicate work and improving efficiency.

Pragati has a master's degree in science and organizational leadership. She has a Black Belt Certification in Lean Management and is a Certified Change Practitioner.

Pragati lives in the Denver metro area with her family. Outside of work, she loves to travel, hike, read and cook.

THE NEWEST MEMBERS OF REGION 8'S DRINKING WATER PROGRAM

Wendy Sams

Wendy will be working with us as a Senior Environmental Employee (SEE) from the East Coast. She previously served as a SEE for EPA Region 4 before Region 8 was fortunate enough to bring her onboard. She'll be supporting LCRI efforts in reviewing the Lead Service Line Inventory reports team as well as assisting with R8DWU distribution.

Ellen Furness

Ellen recently joined EPA Region 8 as a Geographic Information Systems and Technology Assistant via the SEE program. She will assist the Lead Inventory Team as well as the Data Team in data management and the R8 website.

Moving On….

Kim Le

Kim Le, the former Radionuclides Rule Manager, retired from the EPA after 33 years with the Agency. She is looking forward to spending time with her grandchildren and traveling! We already miss her positive attitude and laughter. If you have a question regarding radionuclides, please reach out to Seth Tourney.

Charles Weinberg

Charles was instrumental in keeping our website up to date, our group email box cleared, and a myriad of other actions that helped the drinking water program be efficient. After 18 years with the EPA as a SEE, Charles retired and is enjoying life with his many grandchildren.

Judy Bloom

Judy retired from her position as the Partnerships and Data Section Supervisor after 30 years with the EPA. Look for her on the trails around Denver as she trains for her next challenge - the 500-mile Camino de Santiago.

CHANGE FORM REQUIREMENTS

My System Has Had Changes. What do I do?

System changes can happen frequently, whether it's new staff, staff leaving, contact information, a new well, or treatment. When these changes occur, while it is helpful to let us know via email or phone call, a completed Change Form will need to be submitted to

R8DWU@epa.gov. It is important that the Change Form be complete, as no changes will be made without a completed form. Keep in mind that not all sections of the Change Form will apply to your system. The Change Forms can be found at https://www.epa.gov/region8-waterops/epa-r8-public-water-system-inventory-change-form. We will verify smaller changes via email at Mendrala.angela@epa.gov or phone call at 303-312-6533. If you have any questions, we are glad to help and guide you through the form as you complete it. Make our day and give us a call!

AC PIPE MANAGEMENT

Managing the Replacement of Asbestos Cement Pipe

The use of asbestos cement (AC) pipe (or transite pipe) in drinking water distribution systems was once common in the U.S. It was installed as early as the 1930s with the peak of installation and use between the 1950s and 1960s. The EPA estimates that 15% of water distribution pipes are asbestos cement. Due to the serious health risks associated with asbestos exposure, the EPA attempted to ban all asbestos-containing products on the market in 1989. While that was ultimately overturned, the use of AC pipe was largely discontinued at the end of the last century due to health concerns associated with the manufacturing process and the possible release of asbestos fibers from deteriorated pipes. In 2019, the EPA promulgated a Significant New Use Rule under the Toxic Substances Control Act to ensure that any discontinued uses of asbestos cannot re-enter the marketplace without EPA review, including asbestos cement pipe and fittings.

Much of our drinking water infrastructure has reached or is nearing the end of its useful life and approaching the age at which it needs to be replaced. AC pipe has a typical design life of 50 years. As AC pipes are managed and replaced, special care is required to prevent the release of hazardous asbestos fibers.

The Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, subpart M, sets forth requirements intended to minimize the release of asbestos fibers during renovation and demolition activities involving the handling of asbestos. Pipe replacement is considered a renovation activity which is subject to these requirements.

Prior to the renovation or demolition of a facility, including activities involving AC pipe, the Asbestos NESHAP requires the removal of all regulated asbestos-containing material (RACM). RACM includes any existing friable asbestos material or material which would likely become friable during the course of the planned demolition or renovation operations. That is, any asbestos-containing material that can be crumbled or reduced to powder by hand pressure must be safely removed prior to conducting activities that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.

Conventional and acceptable work practices to replace AC pipe include open-cut trench and abandonment in place. Open trenching is the practice under which the entire AC pipe is excavated, wet-cut into 6- and 8-foot sections using a snap cutter or similar tool, wrapped for containment, and removed for disposition at an approved disposal location. Asbestos cement pipes may also be abandoned in place with the new pipeline laid in a separate area.

While pipe bursting and breaking are popular methods for various types of pipe replacement projects in general, pipe bursting or breaking AC pipe is not permitted under the Asbestos NESHAP. Pipe bursting or breaking of AC pipe renders the AC pipe friable, leaving friable pipe fragments consisting of RACM underground. This method does not comply with the requirements of the asbestos NESHAP and has not been approved by the EPA.

The EPA has approved a closed-trench method for AC pipe replacement, which may be used as an alternative to the open-cut trench and abandonment in place approaches allowed under the Asbestos NESHAP. This EPA-approved alternative work practice standard is known as Close Tolerance Pipe Slurrification (CTPS). CTPS utilizes trenchless technology and does not leave friable asbestos in the ground. CTPS involves grinding the AC pipe while simultaneously injecting fluid to form a liquid cement slurry which is vacuumed out through vertical access points. The new pipe is pulled into the existing pipe cavity directly behind the grinding apparatus. A skim coat of nonfriable cementitious asbestos-containing material is left and solidifies on the outside rim of the new pipe.

Visit the website for more information on:

- the CTPS method
- the asbestos NESHAP

If you have any questions, please contact the Chemical Phase II/V Rule Manager Kendra Morrison, at morrison.kendra@epa.gov or (303) 312-6145.

IMPORTANT REMINDERS FOR CHEMS, RADS, PS

Important Reminders for Chemical, Nitrate, and Radionuclide Sampling

Lab requests

Please do not specify analytical methods on your lab requests (i.e. chains of custody). Laboratories can use different approved methods to analyze drinking water samples. By requesting a specific method, lab personnel are prevented from using alternate methods of analyses, if necessary, due to equipment

downtime or the sensitivity limits of a particular method. Also, the lab may not be certified or accredited for the method you specify. This can significantly slow down or even stop the lab from analyzing your samples.

Also, please do not ask for state-required analyses in lab requests or assume your laboratory knows what to test for in your samples. State requirements for chemical compliance testing are different than EPA-required testing, and some required chemicals will not be analyzed. This could result in a monitoring and reporting violation for the missing federally regulated contaminants. On your lab request forms, simply request EPA IOCs, EPA SOCs, or EPA VOCs and refer the lab to EPA's regulated analytes list.

Include PWSID and sampling locations on your Chain of Custody and use a certified laboratory

Be sure to include your public water system identification (PWSID) number and appropriate sampling location on all laboratory request forms. If you are unsure of the sampling location, check the schematic that is included with your annual Monitoring and Reporting Requirements Report ("To Do"), which is emailed to you every February.

Note that sampling locations for chemical, nitrate, and radionuclides are different than for bacteria. Please do not sample for chemical, nitrate, and radionuclides at the same location that you would normally sample for bacteria. If in doubt, always check your system schematic and sample at the locations designated by the red star ★.

Make sure the laboratory you use is certified for drinking water analysis through their home state, the EPA, or a TNI/NELAP program (i.e. The NELAC Institute/National Environmental Laboratory Accreditation Program). Other accreditations, such as A2LA or ISO, are not considered equivalent for compliance sample analysis.

Spring and warmer temperatures are coming!

As we approach warmer months, be aware that samples being sent for analyses will require extra ice packs. The EPA cannot accept results for drinking water samples that arrive at the lab above the 6^{o} C (42^{o} F) maximum temperature allowed for analyses. If your lab recommends the use of ice packs,

freeze the ice packs for at least 72 hours prior to sampling. Do not sample until the ice packs are frozen solid.

Certified labs must notify their clients if samples arrive outside the temperature requirements. Contact the EPA for direction if this happens.

Send results to EPA Region 8

While some laboratories will automatically send results to us, many do not. It is the responsibility of each water system to ensure that we receive your results. You can email results to R8DWU@epa.gov or FAX them to us at **303-312-7517** (please note that this is a **NEW** FAX number).

NEW PFAS REGULATION

Please note that the information provided in this article is for technical assistance only and does not supersede the rule requirements in 40 CFR 141 Subpart Z.

New PFAS Regulation

The EPA finalized a National Primary Drinking Water Regulation (NPDWR) for six per- and polyfluoroalkyl substances (PFAS) on April 26, 2024:

1. perfluorooctanoic acid (PFOA),
2. perfluorooctane sulfonic acid (PFOS),
3. perfluorohexane sulfonic acid (PFHxS),
4. perfluorononanoic acid (PFNA),
5. hexafluoropropylene oxide dimer acid (HFPO-DA, commonly known as GenX Chemicals), and
6. perfluorobutane sulfonic acid (PFBS).

Exposure to PFAS in drinking water over a long time can cause negative health effects including thyroid disruption, certain cancers, elevated cholesterol, and immune disfunction. Sensitive subpopulations include pregnant women and developing babies. This rule will prevent thousands of deaths and reduce tens of thousands of serious PFAS-attributable illnesses.

Who is affected by this rule?

All community water systems and non-transient non-community water systems.

What are the deadlines?

The EPA will assign initial monitoring to your water system in 2026 so you can meet the April 26, 2027, deadline. Your February 2026 Monitoring and Reporting Requirements Report will communicate your monitoring schedule.

Compliance monitoring is required to begin April 26, 2027, and the monitoring frequency will depend on your initial monitoring results.
Compliance with the MCLs is due by April 26, 2029.

What are the MCLs?

The rule establishes individual maximum contaminant levels (MCLs) for five chemicals, and a Hazard Index MCL for protection from mixtures for four chemicals when they co-occur.

Chemical	MCL
PFOA	4.0 ppt
PFOS	4.0 ppt
PFHxS	10 ppt
PFNA	10 ppt
HFPO-DA (GenX chemicals)	10 ppt
Mixtures of 2 or more of PFHxS, PFNA, HFPO-DA, and PFBS	Hazard Index of 1 (unitless)

Where do I sample?

Sampling is required at all entry points to the distribution system (finished water). Each entry point may have a different monitoring schedule based on the source water type. System interconnections between a seller and purchaser are not required to be sampled.

What are the initial monitoring requirements?

Semiannual sampling is required by groundwater systems serving 10,000 or fewer persons. The two samples will be required five to seven months apart.
Quarterly samples collected two to four months apart are required for surface water systems, groundwater under the direct influence of surface water systems, groundwater systems serving more than 10,000 persons, and any entry point that blends surface water and groundwater.

What EPA analytical methods and laboratories are required?

For **initial monitoring**, the EPA has determined the following labs can be used. These labs must use EPA method 533, EPA method 537.1 version 1, or EPA method 537.1 version 2.

a. Laboratories EPA approved for the Fifth Unregulated Contaminant Monitoring Rule (UCMR5)
b. Laboratories certified by a state laboratory certification program
c. National Environmental Laboratory Accreditation Program (NELAP) state accreditation programs that use the TNI standard – search for NELAP/TNI labs by method (533 or 537.1)

For **compliance monitoring**, laboratories must be certified by the EPA or the state and use EPA method 533 or EPA method 537.1 version 2.

Can previously acquired PFAS samples count towards the initial monitoring requirements?

Yes! Previously acquired PFAS sample results can partially or completely satisfy your initial monitoring requirements if certain conditions are met:

- Samples were collected in accordance with the Fifth Unregulated Contaminant Monitoring Rule (UCMR5)
- Samples were collected by other sample monitoring campaigns, like a state sampling effort
- Samples were collected using approved methods
- Samples were collected on or after January 1, 2019
- Sample collection meets the timing requirements for initial monitoring
- Most recent data from multiple years must be used
- The EPA recommends that labs use one-third of the practical quantitation level (PQL) as the lower bound of their reporting systems.[1]

During 2025 (1) the Wyoming Department of Environmental Quality will be conducting a statewide emerging contaminants study and collecting PFAS samples at public water systems, and (2) the EPA will be conducting PFAS sampling at Tribal public water systems. These samples may satisfy some or all of the initial monitoring requirements.

What are the best available technologies for treatment?

The EPA does not specify or require how water systems must comply with the regulation, but the following technologies were identified as those that are capable of meeting the MCLs: granular activated carbon, anion exchange, and reverse osmosis/nanofiltration.

The EPA identifies feasible best available technologies based on factors such as high removal efficiency, reasonable cost, service life, and ability to achieve compliance.

How can I prepare for this rule?

During 2025, prepare for logistics and establish a budget. Each sample set is approximately $309. Become familiar with the rule by reviewing available fact sheets on the regulation website and quick reference guides on the implementation website. Begin planning for possible treatment upgrades, as needed.

What technical and financial assistance resources are available?

WaterTA supports communities to identify water challenges, develop plans, build capacity (technical, managerial, and financial), and develop application materials to access water infrastructure funding. Complete the form to request technical assistance.

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[1] A PQL is the lowest level at which a contaminant can be reliably quantified within specific limits of precision and accuracy during routine laboratory operating conditions using the approved methods. Note that samples collected prior to June 25, 2024, that were only analyzed down to the level of the MCLs, are acceptable but would not qualify a system for reduced monitoring. To potentially qualify for reduced monitoring, samples must be analyzed down to half the MCLs or lower.

Programs and resources are available to local municipalities, Tribes, and communities, and additional financial resources are available. Please contact Karen Ward at ward.karen@epa.gov if you have questions about these assistance resources.

What if I have questions about the regulatory requirements or PFAS sample results I have already taken?

Contact Kendra Morrison at morrison.kendra@epa.gov or (303) 312-6145.

SEASONAL SYSTEMS SHUTDOWN BEST PRACTICES

Seasonal Systems Shutdown Best Practices

Although there is no regulatory requirement to notify the EPA when a seasonal system stops serving water to the public, there are a few best practices that can save you time.

1. Look in Drinking Water Watch (DWW), and make sure your schedule is accurate. The database has the schedule that you send the EPA in your Seasonal Startup Checklist. If it says that your system is open until October, but you stop serving water to the public in September, you should notify the EPA in writing. Otherwise, the EPA will send out a monitoring violation because we expected your season to go into October.
2. Even if your schedule on the Seasonal Startup Checklist matches what's in DWW, you can still send a note to the EPA letting us know the last day you'll be serving water to the public.
3. Consult with a professional for the best way to winterize your water system.
4. If you are planning on making any upgrades to the water system in the winter, fill out an EPA R8 Public Water System Inventory Change Form and send it to R8DWU@epa.gov with your PWS ID No. and "Inventory Change" in the subject line. Check with Wyoming Department of Environmental Quality to make sure the work doesn't require a permit.
5. Set up a reminder in your calendar to complete the 2025 Seasonal Startup Checklist and send it to the EPA BEFORE serving water to the public in 2025.

If you have any questions, please send an email to Harris.Jamie@epa.gov, RTCR Rule Manager.

TOTAL COLIFORM REPORTS FOR REVISED RTCR REQUIREMENTS

EPA Region 8 is required to maintain a considerable amount of information about each Wyoming and Region 8 Tribal public water system (PWS), including records of tests, measurements, analyses, decisions, and considerations to determine compliance with the national primary drinking water regulations. This is spelled out in the federal regulations at 40 CFR §142.14.

That means that if the EPA doesn't get correct and complete information from the water system or the lab on each water sample report from the lab, we need to ask for revisions of the report. This causes

additional work for the EPA, the lab and YOU, the water system! It may even lead to a monitoring violation if we don't receive that information.

Here is a list of the required information we need in order to process your total coliform sample results for the Revised Total Coliform Rule (RTCR):

1. Public Water System Identification Number (PWSID)
2. Date and time the total coliform sample was collected
3. Date and time the total coliform sample was received by the lab
4. Sample location (i.e., street address, building name, or room name)
5. Sample type (i.e., Routine, Repeat or Special)
6. Total coliform (TC) and *E. Coli* (EC) analytical method
7. Water sample analysis result

The following will explain why these elements are required.

1. The **Public Water System ID Number (PWSID)** is required for a few reasons:
2. PWS's may change names or owners, but the PWSID stays the same. For the EPA to track the ongoing water quality at a site, we must have the PWSID on all lab reports.
3. If a PWS has an arrangement with a lab to have their lab results sent electronically to the EPA, we may not receive the data if there is no PWSID on the chain of custody form. In this case, the PWS will get a monitoring violation when, in fact, the sample was collected. *Remember: It is the responsibility of the Public Water System, not the lab, to ensure that data arrive at the EPA by the date they are due.
4. The customer name listed on the lab report is sometimes not the PWS name that we have in EPA's database. Instead, a consultant or a parent company is listed on the form. So, without a PWSID, the EPA can't tell which PWS collected the water sample.
5. The **date and time the total coliform sample was collected** informs the EPA of the correct monitoring period for the sample. For example: a sample collected on October 1 cannot be counted for the September monitoring period.
6. The **date and time the total coliform sample was received by the lab is** also required for determining compliance with the Revised Total Coliform Rule since the lab methods only allow 30 hours from the time the sample was collected to the time the lab starts the analysis on the water sample. If a sample was collected on September 23 and the lab doesn't receive the sample until September 25, then that is over 30 hours, and the lab will reject the sample. The water system is required to collect another sample before September 30 to avoid a monitoring violation.
7. The **sample location (i.e., street address, building name, or room name)** is required for comparison with the Sample Siting Plan and to determine where in the distribution system a total coliform or *E. coli* positive sample result(s) may have occurred.
8. The **sample type (i.e., Routine, Repeat, or Special)** is required to determine if the required samples were collected that may trigger an Assessment or a monitoring violation. If a Routine sample was marked Special, then it will not be counted towards compliance, and the PWS will

get a monitoring violation. If a Repeat sample is marked Routine, then the PWS will trigger an Assessment. Please see these detailed instructions for more information about the correct way to label your water samples for the Revised Total Coliform Rule (and the Ground Water Rule).

9. The **analytical method** is the test the lab uses to analyze your water samples. There is a list of approved testing methods that labs are required to use for total coliform samples. If a lab uses an unapproved method, the EPA will reject the sample, and the water system will get a monitoring violation. Please check with your lab to make sure they are using an EPA-approved test method.
10. The **Water sample analysis result**, whether positive or negative is critical to determine compliance with the regulation. If a sample was total coliform positive, but *E. coli* was not analyzed, it can trigger further actions or even a violation.

WATER SYSTEM RESPONSIBILITY

Ultimately, it is **your** responsibility to make sure you use an EPA certified lab and that the correct information is used on all of your chain-of-custody forms and sample bottles when they are submitted to the lab.

BE SURE TO WRITE CLEARLY AND NEATLY ON YOUR BOTTLES AND LAB FORMS!!!

Take a few minutes before you collect your sample or before you drop it off at the lab to ensure the correct boxes are checked and your 2s don't look like 6s or 1s don't look like 7s, etc. Likewise, when you receive your sample results, you should look over the lab report and make sure all 7 items described above are on the lab report.

How to Correct a Mistake in a Lab Report for the EPA

If you see a mistake or something missing from your lab report, please work with the lab to get the information corrected and (re)sent to the EPA. In some cases, it is ok to write the correction on the lab report and then date and initial the correction. This is okay if a PWSID is missing or the sample location is missing. However, once you receive a lab report, you cannot change the sample type from Routine to Special, especially if the result is total coliform positive (TC+).

If you are revising a lab report, you must include documentation and an explanation as to what the revision was and why it was necessary. Communication is a large component to keeping your water system in compliance!

REMEMBER: It is MUCH easier to fix a mistake BEFORE a sample is analyzed than after you receive a violation!

BEST SAMPLE SHIPPING PRACTICES FOR SUMMER

Best sample shipping practices for summer

If this coming summer is like the last few summers, maintaining sample integrity during shipping will be challenging. Summer temperatures have been high, and the shipping sector can be impacted by resource shortages.

Here are some tips and considerations to ensure your samples arrive at your laboratory within temperature and hold-time requirements. Always check with your certified lab for their packing and shipping recommendations.

Some overall considerations:

- Sample early in the compliance period so if sample temperature and hold time are exceeded or there are shipment delays, you can resample before the end the monitoring compliance period and avoid violations.
- Hold times for contaminants vary from very short (e.g., total coliform, nitrate/nitrite, asbestos) to longer, and they are dictated by the testing to be performed on the samples. The hold time begins when you collect your sample and ends when the laboratory analyzes your sample. The hold time does not end when the lab receives the sample, and most samples require some time for setup, so build extra time in planning for sample shipment.
- Check with your lab for instructions and any recommendations.
- Lab staffing on weekends is not a guarantee. Notify the lab if shipments will arrive near or on a weekend.
- Certifications require labs to notify their clients if samples arrive outside the requirements for temperature, hold time, and volume. Contact the EPA for direction if this happens.
- Most carriers do NOT store shipments overnight in a temperature-regulated facility. Coolers and boxes are usually stored on trucks in lots, subject to outside temperature extremes.
- Some next day air shipments may be transported out of state and then to your lab, so shipments could be affected by weather delays outside of the state from which samples were collected.

Ensuring Adequate Cooling and Successful Sample Delivery

- Make sure there is adequate cooling and increase the amount of ice used during summer shipments.
- Almost always, samples should be kept cool at $<6^{o}$ C or $<42^{o}$ F.
- If your cooler is too small for adequate ice, request a larger cooler.
- Place your samples in the middle of the cooler as far away from the sides as possible.
- In general, wet ice cools better than blue ice or ice packs. A mixture of ice blocks and wet ice can be used for additional cooling.
- If your lab recommends wet ice, cool your samples with ice in Ziploc baggies.

- If your lab recommends the use of ice packs, freeze the ice packs for at least 72 hours prior to sampling. Do not sample until ice packs are frozen solid.
- Place temperature blanks near the ice. Do not place temperature blanks along the edges of the cooler away from ice or in the top of the cooler.
- Consider taping around the cooler lid to seal in moisture. Leaky coolers can be discarded by shipping couriers.
- Ship samples to the lab as soon as they are collected.
- Refrigerate all bottles if unable to pack and ship immediately, keeping in mind that this may not be an option for samples that have short hold times.

Questions?

If you have any questions, please contact Kendra Morrison at morrison.kendra@epa.gov or (303) 312-6145, or Laura Hult at hult.laura@epa.gov.