



Fact Sheet on State Reporting Guidance for Unregulated Contaminant Monitoring

BACKGROUND

EPA has developed and is distributing to the Regions and States a document entitled "State Reporting Guidance for Unregulated Contaminant Monitoring". As the name indicates, this guidance document is intended for use by States and Regions in reporting unregulated contaminant data to EPA Headquarters. These data will be used together with other available data to assist EPA in determining the occurrence of unregulated contaminants in drinking water and whether or not any of these contaminants should be regulated. The requirement for EPA to issue regulations and collect data for this purpose was established at Section 1445 of the Safe Drinking Water Act Amendments of 1986. This provision applies to all public water systems; however, any system serving less than 150 service connections is deemed to have complied if such system makes its facilities available for sampling by the State. The Act further requires that sampling for unregulated contaminants be required every 5-years. Section 141.40 of the Phase I, II and V regulations implement this section of the Act. Further background on these provisions is provided in the guidance document. Over 25,000 public water systems nationally are subject to these requirements and have already reported data to the States and EPA.

The guidance itself is intended to simplify and reduce reporting and data management costs to both States and EPA by providing a standardized set of data elements and a consistent data format. Although not essential to the mechanics of data management, the guidance also contains information on the use of waivers by the States to relieve public water systems that did not detect contaminants in their samples from repeat sampling for the same contaminants. This aspect of the reporting guidance derives from EPA regulations and discussions in the preambles of regulations related to unregulated contaminant monitoring.

A draft reporting guidance document was issued for comment in late January of 1993. EPA urged at that time that the guidance be used in the interim to hold to schedules already established by EPA and the States for the Phase II and V unregulated monitoring cycles. A number of States have been using the interim guidance, and data from several States have been received through the existing automated information system (FRDS) as requested.

Comments were received on the draft document from all EPA Regional offices and 12 States as well. The draft document was also reviewed by the Association of State Drinking Water Administrators (ASDWA) and a revised version shared with the ASDWA/EPA Data Management Steering Committee. The comments received were fully considered in finalizing this document.

Concurrent with the development of this reporting guidance, EPA has developed a new automated data management system to replace FRDS named the Safe Drinking Water Information System (SDWIS). While not scheduled to be fully operational until January 1995, the new system has been designed to accept the unregulated contaminant data in the existing FRDS format and provides a simplified data entry capability which will reduce the data entry burden of the previous system by automating data entry when a group of contaminants measured by a single analytic method are all below the method detection limit. This capability of SDWIS to handle unregulated contaminant data is currently operational in FRDS.

SUMMARY OF MAIN PROVISIONS OF REPORTING GUIDANCE

Under current regulations, there are a total of 48 unregulated contaminants for which a public water system may have to monitor. Twenty non-discretionary from the Phase I list, 14 at the discretion of the State from the Phase I list, 11 non-discretionary from the Phase II list and three aldicarbs from 1992 EPA regulatory stay of the Maximum Contaminant limit for these substances. As discussed in the guidance:

States are advised to consider exercising their waiver authority for second round monitoring of non-discretionary contaminants from the Phase I list for contaminants not detected in a public water system's first round monitoring;

States may defer requiring monitoring for Dicamba from the Phase II list until December 31, 1995. This would provide States additional time to make waiver determinations for individual public water systems for this contaminant which can reduce the monitoring cost to a public water system for the Phase II group by about one-third;

States are encouraged to waive second round monitoring of contaminants on Phase I State discretionary list;

States are no longer requested to routinely enter Method Detection Limits for each individual contaminant. The SDWIS provides an automated group method which virtually reduces contaminant data entry to only those public water systems that have positive detects;

the number of data elements to be reported by States to EPA have been reduced from 25 in the interim-draft guidance to 12 in the final guidance.

The cumulative effect of the above provisions, if properly implemented, will be a substantial reduction of the cost of monitoring for public water systems, a substantially reduced data management burden for the States and EPA and higher quality and more timely availability of results of the unregulated monitoring to the regulatory decision making process.

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