TCEQ Responses to Laboratory Comments (8/6/2017)

Explanation: The TCEQ's Public Water System Supervision (PWSS) Program posted revisions to the following quality assurance project plan (QAPP) addenda, and requested comments from laboratories by July 12, 2017.

-Addendum 2 - Analysis and Reporting of Lead and Copper under the Lead and Copper Rule

-Addendum 3 - Analysis and Reporting of Water Quality Parameters under the Lead and Copper Rule

-Addendum 4 – Analysis and Reporting under the Revised Total Coliform Rule

The laboratory comments are compiled in the table below. The TCEQ responses document how the TCEQ will address each comment in the final documents. After the TCEQ finishes editing the documents, they will be submitted to the EPA for approval as part of the annual update of the PWSS Program's QAPP. When the EPA approves the QAPP, it (along with all the addenda) will be posted on the TCEQ PWSS Program's web site at https://www.tceq.texas.gov/drinkingwater/pwss.html . The documents will go into effect on November 4, 2017. Notes: The first few pages of comments below are more "general" in nature and refer to more than one document. The "we" in the responses refers to the TCEQ's PWSS Program. For questions about these responses, contact the TCEQ's Water supply Division at (512) 239-4691 and ask for the PWSS Program's Quality Assurance Manager.

#	Addendum	Comment	Page #	TCEQ Response
1	General	Include language similar to "Addendum #4 of Guidance for Analysis & Reporting Under the Revised Total Coliform Rule" allowing the labs to customize the LCR and WQP COCs to add their name/logo, contact information, lab ID, and other pertinent information for proper reporting and invoicing. Modified forms may be submitted to TCEQ for review and approval prior to use.	Form 20679 Form 20783 Form 10525	The TCEQ received numerous comments from laboratories requesting the addition or removal of items to and from TCEQ COC forms, depending on individual laboratory needs. To address these comments, we will provide a web site address for the official TCEQ forms in each addenda, and a list of their mandatory components. Laboratories can use the TCEQ forms; or, they can create their own forms, if they want to add information. Once the laboratories alter the forms, they will no longer be TCEQ forms and we will request that you remove TCEQ form numbers from the ones you create. The process for revising the forms will be described in each addenda. There is one exception to the information in the paragraph above. If a laboratory has not yet transitioned to the E2 system for reporting Total Coliform and *E. coli* results to the TCEQ, they need to use TCEQ Form 10525 w/o modifications except to the Laboratory name, contact information, etc..
2	General	At the bottom of the COCs, can we get 1 or 2 more lines for the Relinquished By and Received By sections? Per the rules that we must follow for wastewater samples, anytime the samples change hands, we are supposed to relinquish and receive the samples. It is normal practice for us to have the client relinquish the samples to our route personnel who pick up the samples from their office. Our route personnel receives them. Then when our route personnel arrives back at the lab, he relinquishes them again, and the lab receives them. This way we cover our bases for the samples going: Client --> In Transit by Route Personnel --> Route Personnel delivers to Lab Personnel.	Form 20679 Form 20783 Form 10525	There is no space on TCEQ Form 10525 to add more lines. We will review the other two forms to see if it is feasible to add lines; and will, if there is space. Please see the response to Comment #1 which allows the laboratories to modify the TCEQ forms (with the exception of Form 10525 when used for reporting Total Coliform/*E. coli* results to the TCEQ.)
3	General	Move language in most of the "Notes" to the main body of the document. Most of the notes are directives/instructions		The "Notes" will be reviewed and "directives/instructions" will be included in the main body of the final documents.
4	General	In general, the TCEQ needs to be very clear about which samples need to be rejected outright because of incomplete or incorrect		Incomplete and incorrect sampling documentation (on the part of PWSs) is an ongoing problem with the sample results received from the laboratories. This

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		documentation, when they are delivered to the laboratory. It is not always clear what documentation may be modified by the PWS at the time of sample receipt. The TCEQ also needs to be clear about the types of things require coordination with the TCEQ document. In the LCR document, it state "Laboratories may reject samples or results in coordination with the TCEQ and the PWS." Does the lab have sole discretion to reject samples or does the laboratory always need to coordinate with TCEQ and PWS to reject samples? Coordination with TCEQ and/or PWS to reject samples is not mentioned on page 9.		problem can and has resulted in monitoring and reporting violations for the PWSs. We attempted to address this problem in the QAPP addenda, while still providing as much flexibility for the laboratories as possible. This way, samples don't need to be rejected and recollected without good cause, and/or laboratories do not need to spend time conferring with the TCEQ needlessly about issues with sample submittal documentation. We will address this comment in all 3 documents by adding additional clarity to what circumstances are due cause for rejecting samples outright.
5	General	Add: a time period for TCEQ to review and accept CAs, such as 14 days. Establish timeline to complete the entire CA cycle. .		The QAPP addenda already have timeframes included for laboratories to inform the TCEQ of significant deviations and submitting associated reports. These types of deviations will likely require immediate attention on the TCEQ and/or the laboratory. The time period for TCEQ's review and the entire CA cycle will depend on the situation. To address this comment, we will add language to this effect "The TCEQ will review each corrective action report and respond to the laboratory within 30 days if (1) actions taken to resolve the deviation are acceptable (2) action taken to resolve the deviation are unacceptable, or (3) the TCEQ needs more time to review the corrective actions and/or research the issue."
6	General	Laboratory ID number (NELAP accreditation certificate number) should not be included in requirements for the analytical test reports or COCs. The 2009 TNI Standard does not require the laboratory to include a NELAP accreditation certificate number on analytical testing reports. The TCEQ Laboratory Accreditation Program (LAP) requires, if the certificate number is used, to include the entire number (laboratory ID, year of revision, and iteration number). NELAP accreditation certificates are updated annually at a minimum and often more frequently. Given the added cost of updating the certificate number each time the Year of revision or iteration number Is updated, this proposed requirement is considered unnecessary and overly burdensome for the laboratory.		The TCEQ Laboratory ID number needs to be reported with all data so the EDD or manual data can be properly associated to the laboratory in SDWIS. The TCEQ Laboratory ID Number is a unique number and does not change annually as the NELAP Accreditation Certificate Number does. In some cases, this Laboratory ID number is the Laboratory Accreditation Certificate Number minus the last 4 digits. In other cases, it is another number altogether which was assigned by the TCEQ. This will be clarified in the appropriate places in all documents to eliminate the confusion between the two ID numbers. See next comment.
7	General	Is Accreditation ID the same as Lab ID in the MRF? If so, please standardize language. Regarding the RTCR document - Sample Type: Routine However, other forms do not use the term "Routine", instead the term used is "Distribution". Are these interchangeable? Please standardize language		Yes. We changed TCEQ Accreditation ID to TCEQ Laboratory ID because the TCEQ's Accreditation staff told us the use of the term Accreditation ID number on the MRF was creating confusion with the laboratories. We will standardize the language on all forms and elsewhere in all 3 documents. Likewise, we will standardize the use of the term "routine" samples to be consistent with the terminology in the Revised Total Coliform Rule

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8	General	Do we have to include rejected samples in EDD	10	Yes, all cases of rejected samples need to be reported to the TCEQ as an electronic data deliverable. In these situations, the EDD will include information in the sample table with no result(s). This is necessary to tie replacement samples back to the original sample to ensure PWSs receive proper sampling credit. In cases where certain rejected samples can't be reported using E2, those samples should be reported to TCEQ manually.
9	General	PDF electronic file name format should allow more information, as necessary, to avoid duplicate file names for different reports and for the laboratory to manage files internally. The electronic file name format as in Example 2 risks producing duplicate file names for different reports (i.e., PWS collects samples on one day but submits to the laboratory on multiple, different days).In addition, the laboratory is not able to efficiently manage internal files using the electronic file name format as in Example2 and needs discretion to modify naming (i.e., include laboratory sample ID). Although it is stated that the laboratory can assist the TCEQ by providing the information in this format, p.5 indicates that laboratories must comply with all programmatic requirements and specifications or TCEQ may refuse to accept data. It is unclear whether the format described on p.13 is optional or required.		The file names <u>are not flexible</u> as they are part of the TCEQ file naming structure to manage all of TCEQ's records. This will be clarified in the final versions of the appropriate addenda. The TCEQ will work with laboratories on an individual basis to help with possible adaptations on the laboratory side.
10	General	Does TCEQ accept sample storage at temperatures above the freezing point of water to 6°C as in TNI Standard EL-V1M2-ISO-2009 5.8.9 (below) and, if so, would the same allowance extend to all programs covered under TCEQ PWSSP QAPP (r12)? 5.8.9 Additional Requirements – Sample Storage and Disposal a) Samples shall be stored according to the conditions specified by preservation protocols. i. Samples that require thermal preservation shall be stored under refrigeration that is +/2°C of the specified preservation temperature unless regulatory or method specific criteria exist. For samples with a specified storage temperature of 4°C, storage at a temperature above the freezing point of water to 6°C shall be acceptable		Yes. The current language in Addendum 3 is as follows: "*Samples for the analysis of alkalinity, chloride, conductivity, sulfate, TDS, silica, and orthophosphate must be delivered to the laboratory in coolers, on ice, and comply with the temperature requirements specified in Table 1. Thermal preservation is considered acceptable if the arrival temperature ranges above the freezing temperature of water up to 6°C. Samples that are delivered to the laboratory on the same day as collection may not meet this requirement. In these cases, the samples are considered acceptable if the samples were received on ice.*" We will review the other 2 addenda to determine if similar language needs to be included.
11	General	Add the following underlined text as noted below to Addenda 2 and 3 as appropriate in Sections – *Reporting Data to the TCEQ*. "The following metadata is needed to successfully code documents which are submitted to the TCEQ Central File Room. Series Code: PWS		The text (either "LCR" or "WQP") will be added to the final versions in the appropriate place.

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		Primary ID: County Code # and Identification #: 7 digits 3+4 (PWS ID #) Document Type: AC Document Date: YYYYMMDD (Collection Date) Document Name: LCR (or WQP) Analysis Report Example: PWS_1010014_AC_20150928_LCR Analysis Report (printed on paper before scanning, top right corner) Example: PWS_1010014_AC_20150928_LCR Analysis Report.PDF (electronic file name) **Note**: There must be a space between "LCR" and "Analysis" and "Report.""		
12	Add. 2 LCR	Modify Form 20683 with the following: Add: Reporting Information (name, address, city, state, zip, email) Add: Collection Method Add: Sample Type/Matrix Add: Observed/Corrected Temperature (°C) Add: Traceability for Thermometer, pH paper, and HNO3 Add: Reference to TXDWW Change: # of Pages to: # of Tot #, example: 1 of 1, 3 of 5, etc. Change: Sample Location to: Sample Location (Address and sink), an example will be helpful. Remove: second occurrence of collection time (in blue). Remove: Lab analysis date/time Remove: Lab preservation date/time columns	Form 20683	See response to comment #1.
13	Add 2 LCR	CHAIN OF CUSTODY FORM 20683 INSTRUCTIONS should have the same required elements as stated inTable1 LCRCOC Form Required Information. CHAIN OF CUSTODY FORM 20683 INSTRUCTIONS state that all unshaded columns and spaces must be completed or laboratory will reject. There are more elements in unshaded columns and spaces in COC Form 20683 than required elements listed in Table1 LCRCOC Form Required Information	Form 20683	The TCEQ COC Form Instructions and text in Table 1 will be reconciled in the final versions
14	Add 2 LCR	Add the cycle to the form eg. 6M1, 6M2 or Reduced	Form 20683	See response to comment #1
15	Add 2 LCR	Have the number of samples required and submitted on the form 20683	Form 20683	See response to comment #1
16	Add 2 LCR	Table1 on p.8 should not include "DS01" under description for Sample Point ID. "DS01" should also be removed from, and "LCR001" added to, the Sample Point ID Number row in the Chain of Custody Form 20683 Instructions. PWSs are often confused by the presence of "DS01" and the absence of	8 Form 20683	The changes will be made in the final version.

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		"LCR001" in the Chain of Custody Form 20683 Instructions under Sample PointID.		
17	Add. 2 LCR	Have the analyte name next to code	EDD	No change can be made to the format of the EDD because it is a federal database.
18	Add. 2 LCR	Allow labs to see addresses so we can help customers	DWW – Sites Reg/back-up	Due to security reasons, the TCEQ determined that sample addresses can't be accessible via DWW. The lab can contact TCEQ directly to request a list of sample site addresses.
19	Add 2 - LCR	if there is an error or the time is not in military time and not indicated with AM or PM, can the lab clarify this with an email?	Form 20683	No. Laboratories should make every attempt to detect this issue (and similar ones) at the time of sample receipt so they can request that the PWS correct it while still on the premises. If the laboratory does not catch it at the time of sample receipt, then it is not authorized to change forms after the fact.
20	Add. 2 LCR	Add: the words "at least" …the sample must be mixed, held for at least 16 hours, and then	9	The change will be made.
21	Add. 2 LCR	Change may to must. Laboratories must reject samples upon receipt if samples and/or paperwork do not comply with….	9	See response to comment #4. The TCEQ will further define when samples must be rejected outright due to sample/paperwork issues. .
22	Add. 2 LCR	Add: "Sample container does not have 1L fill line" to the list of reasons for rejecting a sample".	10	The reason identified in this comment will be added to the list of reasons for rejecting a lead/copper samples. Collecting exactly a 1 L sample is an important component of lead and copper sampling; therefore, a fill line is needed on the bottle. If the sample collection bottles do not have a fill line, then samples must be rejected. This should not be a problem as laboratories are supposed to supply the containers.
23	Add. 2 LCR	Update the Note to reflect Pb & Cu samples, it currently describes a situation involving other water quality parameters.	10	The example will be changed to reflect a lead/copper situation.
24	Add. 2 LCR	Change frequency of LFB from "every analysis day" to "with each preparation batch of samples"	11	The change will be made.
25	Add. 2 LCR	Remove the words "or near" …containing known and verified amounts of analytes at or near the MRL	12	The change will be made.
26	Add. 2 LCR	Suggestion: Set program-specific criteria for the MRL verification check, such as 70 – 130 % recovery.	12	The TCEQ's Public Water System Supervision Program has not developed program-specific numeric criteria for MRL verification checks. No program-specific criteria for MRL verifications will be added to the final documents..
27	Add. 2 LCR	Indicate whether PDFs of LCRCOCs, Lab COCs, and Analytical Test Reports need to be grouped by document type, PWS, or all together. Is there a specific order, other than the LCRCOC needing to be on top, for these documents?	12	LCR data submittals need to be grouped by sample set. This will be clarified in the final document. Our only request in regard to "order" is for the LCR COC to be on top. This also applies to WQP data submittals.
28	Add. 2 LCR	Does the information in Example 1 need to be on a blank sheet of paper or on the LCRCOC that goes on top of the PDF document?	13	The information should go on the upper right hand corner of the LCRCOC. This will be clarified in the final document.
29	Add. 2 LCR	Is Example 2 an example of a PDF file name? If so, does it apply to just Analytical Reports or the entire package?	13	Yes. It applies to the entire package. This will be clarified in the final document.
30	Add 2 LCR	The two columns labeled "Original Lab Sample ID#" and "Original Collection Date" are a little confusing to me, because	Form 20683	These columns apply to "replacement" samples in cases when the initial samples were rejected. This information is important because original sample ID

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		at first look they appear to be needed for if the samples are subcontracted to another laboratory, but they're actually for re-sampling only. Can these two columns be clarified by adding some sort of text at the top of these two columns stating something along the lines of "If Resample". I understand that his is already clarified on page 2 with the rest of the instructions, but part of the Lab side of the COC asks if the "PWS Portion of Form Complete", and this has been placed on the PWS side of the COC.		# and original collection date need to be reported in the EDD with the results of the replacement sample. Some text (as space allows) will be added to the form in those boxes for clarification.
31	Add 2 LCR	Under the Lab side of the COC, there is no column for information if a sample is subcontracted to another lab. As it currently sits, if the sample, for example, is given by the customer to ABC Lab, and ABC Lab subcontracts it to DEF Lab, there will be no way for 1 of the labs to label the sample, as there is only 1 "Lab Sample ID #" blank available. Should it fall to the original ABC Lab? Or to the DEF Lab?	Form 20683	This is an important consideration and probably more relevant to WQPs because those samples are most likely to be subcontracted to another lab. We will address this in the final document.
32	Add 2 LCR	Under the Lab side of the COC, there is a column at the end labeled "Collection Time", and the instructions page gives no indication of what this column is for. Please clarify.	Form 20683	This will be fixed the final form
33	Add 2 LCR	Under the Lab side of the COC, for the Sample Preservation, the first column is Time, followed second by Date. This is the only instance on the entire page where Time is put first, before Date. I believe lab personnel are likely to frequently enter these in backwards with cross-outs to fix the mistake, as it is common in the USA to do Date, then Time, as indicated everywhere else on the page. Can these be switched	Form 20683	The order of time and date will be switched in the final TCEQ form
34	Add 3 WQP	The receiving laboratory should not be responsible for including pH and temperature measurements on the analytical report with a note indicating that pH and temperature were measured in the field and by whom. The receiving laboratory should also not be responsible for including this information in the Sample Table of the EDD. Typically pH and temperature, as field measurements, are performed by the PWS. The PWS should be responsible for submitting that data directly to the TCEQ. Temperature and pH measurement results are provided to TCEQ on WQPCOC 20679. Although it is stated that the TCEQ requests that pH and temperature be included on the report, p.5 indicates that laboratories must comply with all programmatic requirements and specifications or TCEQ may refuse to accept data. It is unclear whether including pH and temperature measurements on the test report is optional or required.	Form 20679	The pH and temperature measurements need to be submitted to the TCEQ in an electronic data deliverable. Currently there are obstacles to having all the PWSs submit pH and temperature in an electronic data deliverable. For this reason, the TCEQ requests that the initial, receiving laboratory submit the pH and temperature measurements in the EDD when they submit their other results. We will modify the final version of Addendum 3 per this comment to <u>not</u> require the initial, receiving laboratory to be responsible for including field measurements of pH and temperature on the analytical test report.

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35	Add 3 WQP	not on the new 20679 yah! but If pws collects field data, is it to be included in report and edd?	Form 20679	Yes. The TCEQ requests that the initial, receiving laboratory include the results of pH and temperature measurements as field data, in the field portion of the sample table of the EDD but not the analytical test report. See response Comment #34.
36	Add 3 WQP	temp and ph always measured in field…so why comment. If we are provided ph and temp we would EDD it anyway.	18	The TCEQ requests that laboratories report pH and temperature results in the field portion of the Sample Table in the EDD. All laboratories are being asked to approach this similarly. See responses #34 and #35.
37	Add 3 WQP	Have the names of analytes in the EDD table	EDD	SDWIS is hard-wired to accept analyte codes in the results table in line 8, rather than the names of analytes. The laboratory cannot submit data based on names of analytes instead.
38	Add 3 WQP	-In the Sample Information section, there is a spot that asks "Are temperature and pH included on the PWS's laboratory approval form on file at TCEQ?" Please clarify what this means, because I'm having a hard time understanding what it's asking for, but the instruction page gives no clarification in its current state.	Form 20679	Entities must have TCEQ approval in order to measure pH and temperature in the field when collecting WQP samples. To gain approval, entities (laboratories and/or PWSs) must submit a Drinking Water Laboratory Approval Form to the TCEQ. At the time of sample collection, field personnel document adherence to this requirement by checking "yes" to the question on the WQPCOC - *"Are temperature and pH included on the PWS' Drinking Water Laboratory Approval Form on file at the TCEQ?"* See Comment #39.
39	Add 3 WQP	on new 20679 are temp and ph included on pws approval form on file with tceq Yes or No". What if lab collects field data should pws note that in sampling plan. What happens if left blank?	Form 20679	If the laboratory collects the field data on behalf of the PWS, it still needs to be approved to run pH and temperature. The COC question, specified in the previous response will be modified in the final version to address those situations in which the laboratory collects pH and temperature on behalf of the PWS.
40	Add 3 WQP	We cannot see if submission was success	DWW	Labs can check DWW to see if specific samples were successfully migrated.
41	Add 3 WQP	Quarterly deadlines not showing on DWW. Also when is the sampling and reporting deadline? At the end of each quarter or at the end of 6m1 and 6m2?	DWW	Reporting deadline is 10 days after the compliance period ends. The TCEQ requests that laboratories report data weekly and not wait until the deadline. This will be clarified in the final document.
42	Add 3 WQP	What if we are the same lab?	21	If all WQP analyses are performed by the same lab than the section addressing this subject on page 21 – *How to Report WQP Results to the TCEQ When Single Samples are Analyzed by Multiple Laboratories* - does not apply
43	Add 3 WQP	Does our test report need to be changed to follow the example ?	27	The test report in Exhibit 2 of Addendum 3 is provided as a tool only. It is not mandatory. The laboratory's Analytical Test Report must; however, include the required information specified in the document..
44	Add 3 WQP	Not liking the new form. does not have sample designation. It does not have place for EWQP, state assigned EP001. Does not have "assistance" like the current form where it tells you to put EPWQP or EP001 etc but that EPWQP and EP001 etc is required in the EDD. How would the lab know that 123 Smith Road is EP001?	24	TCEQ Form 20679 and the associated instructions will be changed appropriately to address this concern. See response comment #1.

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45	Add 3 WQP	After the requirement for WQP monitoring is reduced, TCEQ should notify both the PWS and the laboratory when monitoring is required and which analytes are included. The laboratory would be better able to ensure successful analysis of required WQP parameters with access to required monitoring schedules, including analytes, after the requirement for WQP monitoring is reduced.	6	The TCEQ provides notifications regarding required monitoring to the PWSs. The TCEQ is not aware, in advance, of which laboratories PWSs utilize to analyze their WQPs. It is the PWS's responsibility to work with their laboratory to ensure the correct suite of parameters is analyzed. The laboratories can access the needed information from Texas Drinking Water Watch.
46	Add 3 WQP	In addition to the container options provided,1-250 mL and 1-1L containers should be allowed for sample collection.250 mL is sufficient volume for all Tests requiring sample preservation with acid. Allowing for smaller sample volume will reduce costs for shipping and containers in addition to helping the laboratory meet pollution prevention goals by reducing waste stream volume.	8	There may be laboratories that use wet chemistry methods to analyze parameters requiring acidification (Ex., hardness). In these cases, a 250 mL sample would not be sufficient. The final document will be clarified to allow 250 mL containers for acidified samples under certain circumstances (i.e., no wet chemistry analyses).
47	Add 3 WQP	Table2. Allowable Methods for WQP Sample Analysis, footnote 10 should read"SM2340B" instead of "SM2540B"and should require TCEQ Water Supply Division Laboratory Approval to run calcium and TCEQ NELAP Accreditation for magnesium. Footnote 10 states that SM2540B can be used to calculate Hardness and that neither accreditation nor approval is required. SM2540B is for analysis of Total Solids so it is assumed that SM2340 B was intended to be specified here.	12	The footnote will be corrected in the final document.. SM2340B is acceptable as long as the laboratory has TCEQ Water Supply Division Laboratory Approval to run calcium and TCEQ NELAP Accreditation for magnesium.
48	Add 3 WQP	Provide a clear copy of a Water Quality Parameter Chain of Custody Form 20679 as the posted copy has poor resolution.	24	The final versions of the TCEQ COC will not be included in the completed documents. A web site address will be provided instead. This will resolve the "poor resolution" issue.
49	Add 3 WQP	At the top where it asks if the samples are Compliance or Noncompliance, Compliance is spelled incorrectly.	Form 20679	The spelling error will be addressed in the final TCEQ form.
50	Add 3 WQP	-Under the Sample Information section, the Replacement Sample checkbox is all the way to the left-hand side, but the information about the original samples is all the way to the right-hand side. I personally find this a little confusing, and my suggestion is that the Replacement Sample checkbox would be better suited next to the Original Sample ID and Original Sample Date boxes, so that all of the replacement sample questions are grouped together.	Form 20679	These related columns will be associated in the final TCEQ form.
51	Add 3 WQP	Under the Sample Information section, there are two columns labeled Source ID and Sample Location. These are typically used for DS01 or EP001 for the Source ID column, and then the address of the location in question (ex: 123 Smith Street) in the Sample Location. However, the instruction page states to put DS01 or EP001 in BOTH columns. Please clarify the information on the instruction sheet.	Form 20679	The instructions will be fixed to address the required information.

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52	Add 3 WQP	-At the bottom of the Sample Information section, where the PWS representative is supposed to sign and date, the Time has 3 blanks currently associated with it. Please clarify what is supposed to go in these 3 blanks, or combine the 3 blanks into 1 large blank for the time.	Form 20679	This mistake will be corrected in the final document.
53	Add 4 RTCR	Underline: "not a requirement" Instead of only the word "requirement	9	The whole phrase will be underlined.
54	Add 4 RTCR	Rephrase the following: The laboratory must confirm that a chlorine residual was measured and documented in the field To: The laboratory must confirm that a chlorine residual measurement was documented for all samples types on the MRF or COC prior to arrival at the laboratory. Challenging for labs to confirm measurements were taken and documented in the field when this activity occurs outside their scope/authority	9	The applicable language will be changed to "The laboratory must confirm that a chlorine residual is documented on the MRF or COC, in all cases, <u>except for construction and special purpose samples</u>, prior to arrival at the laboratory. In order to help the PWS avoid violations, the laboratory must reject compliance samples (i.e., routine (distribution), repeat, and raw water) without a documented chlorine residual at the time of receipt"
55	Add 4 RTCR	Add: "for all sample types" The absence of chlorine residual "for <u>all sample types</u>" must be confirmed and recorded by the laboratory….	10	No. The absence of a chlorine must be checked and recorded in every <u>compliance</u> sample. This will be clarified in the final document. See related response to comment #77.
56	Add 4 RTCR	Not sure what is meant by sample delivery. Rephrase to provide clarity. Laboratories do not have control on how samples are delivered to the laboratory. The laboratory does inform customers of sample acceptance hours & days.	10	The term "sample delivery" will be changed to "sample receipt." The comment refers to the note on page 10 of the addendum. It was meant to address situations when samples are delivered to the laboratory very late in the day, 30 hours after they were collected (or close to). These samples would need to be analyzed immediately (possibly causing lab staff to work over time) to comply with holding times, or be rejected. It is the laboratories' responsibility to work these situations out with the delivery personnel or the PWS on a case by case basis, not the TCEQ's. This will be clarified in the final document.
57	Add 4 RTCR	2.5 cm, is the unit correct? Please provide clarity.	10	The language in this section will be changed to "When collecting a sample, sampling personnel are required to fill the bottle slightly over the fill line. They must leave ample air space in the bottle (approximately 1 inch, depending on collection container type) to facilitate mixing by shaking at the laboratory prior to determining the absence of a chlorine residual, and running the analysis. If a sample bottle is too full at receipt to allow for proper mixing, the laboratory must not pour off and discard a portion of the sample. Rather, the laboratory must pour the entire sample into a larger sterile container, mix properly, and proceed with confirming the absence of a chlorine residual and running the analysis. Alternatively, if a sample is filled to capacity, the laboratory can reject the sample outright. This may be appropriate if is a recurring situation with an individual PWS."
58	Add 4 RTCR	Add: Colilert-18 ® To include all approved methods not requiring confirmation.	13	Colilert-18 will be included.

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59	Add 4 RTCR	Change language in the "Note". Remove language about past requirements. Stating what was required in the past may cause confusion. State only what is required now.	15	The statement in the note about past requirements will be omitted.
60	Add 4 RTCR	Add: email to the Fax# box	Form 10525	The TCEQ is not allowed to request email addresses so this item will not be added to the final TCEQ Form 10525.
61	Add 4 RTCR	Add: "email" to item #2. To email analytical reports to customers	MRF instructions	See response to comment #60.
62	Add 4 RTCR	Item #1 Add: email To email analytical reports to customers	MRF Instructions	See response to comment #60.
63	Add 4 RTCR	Sample Type "Distribution". Is this term replacing the sample type "Routine"? Clarity. Standardization of sample type among all documents and EDD	Form 10525	Distribution and routine samples are the same thing. The MRF and instructions will be changed to replace the word "distribution" with "routine" to be consistent with language in the Revised Total Coliform Rule. The TCEQ cannot change the format of the EDD because it is a federal database.
64	Add 4 RTCR	Item #4ei Question: does sample type Distribution = Routine? If so, standardize language throughout documents and EDD Clarity. Standardization of sample type among all documents and EDD.	MRF instructions	See response to comment #63.
65	Add 4 RTCR	Item #3di Question: does sample type Distribution = Routine? If so, standardize language throughout documents and EDD Clarity. Standardization of sample type among all documents and EDD.	MRF instructions	See response to comment #63.
66	Add 4 RTCR	The word "Routine" is used as a sample type. However, the MRF no longer shows Routine as a sample type, but instead uses the word "Distribution". Which one is correct?	15	See response to comment #63.
67	Add 4 RTCR	Under "Sample Type", shouldn't Distribution column be Routine?	Form 10525	See response to comment #63.
68	Add 4 RTCR	If a laboratory is submitting results via E2 and sending analytical reports to customers, allow laboratory to modify form by removing shaded fields such as: Incubation start & end date/time Chlorine Checks Test Method Tested by Laboratory Approval Date/Time Reported to Client Date/Time This information is captured in laboratory records, logbooks, and/or analytical reports. Removing these fields will also allow extra space for PWS to write the requested information.	Form 10525	See response to comment #1.
69	Add 4 RTCR	Operator License Number. Is this field optional?	Form 10525	Yes. Laboratories should not reject samples without a documented operator license number on the COC form when it is submitted. If the sample delivery person is also the "operator" then he/she can provide their license number at

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				the time of sample receipt, if the laboratory notices and points out the omission. This will be clarified in the final document. The TCEQ requests the operator license number to ensure the sample collector is certified as required by regulation. Samples collected for Community and Non-Transient Non-Community water systems must be by a licensed operator. There is no licensing requirement for Transient water systems. In that case N/A is the appropriate response.
70	Add 4 RTCR	Why is Operators License # required on MRF? This is record keeping for the system and not a NELAC requirement or an E2 required field	Form 10525	See response to comment #69
71	Add 4 RTCR	Item # 3 For operator license number, how does the lab know if a PWS is Community or NonTransient Non-Community? If the operator license number is required, then change should to must.	MRF instructions	See response to comment #69
72	Add 4 RTCR	Add: references to Texas Drinking Water Watch and the "How to complete MRF" webpage. To assist operators find information needed and instructions to complete the form	Form 10525	See response to comment #1. The reference to the instructions will be added to the final TCEQ form. The reference to DWW will not be added due to space constraints.
73	Add 4 RTCR	Item #4f Chlorine residual must be measured and recorded for each compliance sample… Item 4ei: identifies compliance sample types being distribution, repeat, or raw well. Add: language to 4f indicating chlorine residual not required for "Construction" and "Special" sample types.	MRF instructions	See response to comment #54.
74	Add 4 RTCR	Item #3e Chlorine residual must be measured and recorded for each compliance sample… Item 3di: identifies compliance sample types being distribution, repeat, or raw well. Add: language to 3e indicating chlorine residual not required for "Construction" and "Special" sample types	MRF instructions	See response to Comment #54.
75	Add- RTCR	Include language in this document to inform sample collectors/submitters the reasons labs will reject samples; incomplete form, missing chlorine residuals, etc. Emphasize the new language (by highlighting, text box, etc.) to stress the importance of such requirements and the action laboratories will take.	MRF instructions	This information will be included in the instructions for PWSs - *How to Complete the Microbial Reporting Form (MRF, #10525)* located at https://www.tceq.texas.gov/drinkingwater/pwss.html. Also, the TCEQ is preparing to revise the PWS guidance for total coliform sample collection (Regulatory Guide 421). This information will also be added there.
76	Add 4 - RTCR	The label must have the spaces to record the: unique sample identification (ID)number, sample location, date and time of sample collection and sample collectors initials. Note: Merely recording the unique sample ID number on a	MRF Form 10525	The sample label requirement conforms to the *Manual for the Certification of Laboratories Analyzing Drinking Water, Fifth Edition* - Figure A-1 of Appendix A. The TCEQ believes that the specified label requirement is warranted for microbiology samples, given the volume of samples that are sometimes

		sample collection bottle is not sufficient, even if the ID number can be matched with information on the MRF or the chain of custody (COC) by the laboratory. NELAC requires the laboratory shall have a documented system for uniquely identifying the samples to be tested, to ensure that there can be no confusion regarding the identity of such samples at any time. Why is "Merely recording the unique sample ID number on a sample collection bottle not sufficient" if it allows samples to be uniquely identified in the set submitted?		collected by PWSs during a given time. The additional information provides a good cross check to the MRF.
77	Add 4 - RTCR	The absence of a chlorine residual must be confirmed and recorded by the laboratory at the time of receipt (or at the time of analysis, depending on laboratory operations.). NELAC requirement EL-V1M5-2009 states; Laboratories that receive samples from potable water sources (including source water) that have demonstrated history of acceptable preservation may check a sample from each source at a frequency of once per month if: etc. No specifics in comment to frequency of chlorine check indicating that every sample to be checked and only one per month as an option as specified by TNI. Will this be allowed in lieu of every sample being checked for chlorine? This works in conjunction with the requirement to demonstrate that the thiosulfate can remove up to 10 mg/L chlorine. This requirement is useless if every sample has to be checked.		The laboratory must check every compliance sample (i.e., routine/distribution, repeat, and raw water) for the absence of a chorine residual. If a chlorine residual is present in any of these samples, the laboratory must reject them. This requirement conforms to Chapter 5, Section 8.3 of the *Manual for the Certification of Laboratories.* This is a situation where the TCEQ's programmatic requirement is more stringent then what is required by the TCEQ's laboratory accreditation standard. This will be clarified in the final document.
78	Add 4 - RTCR	Can a separate chain of custody be used instead for custody section? TCEQ	MRF Form 10525	Yes. This will be clarified in the final document.
79	Add 4 - RTCR	Why incubation begin "and end" Date and time on form? This is record keeping at the lab and not a NELAC reporting requirement or an E2 requirement	MRF Form 10525	See response to Comment #1. FYI- There are fields in E2 (currently optional but may change in the future) that capture this information. The TCEQ can check this information to confirm holding times are met; therefore, the TCEQ includes it on the MRF 10525.
80	Add 4 - RTCR	Remove the area for recording the incubation date/time on each reporting form. This information is maintained by the lab and is traceable back to the bench sheets through the unique sample ID number. Having to record this level of information on every form is a burdensome task, especially for a laboratory that analyzes several hundred samples per month	MRF Form 10525	See response to Comment 79.
81	Add 4 - RTCR	There isn't an area for documenting the S/N for temperature monitoring devices when samples are at the lab. Please provide as this missing information could result in an audit finding	MRF Form 10525	See response to Comment #1. The "corrected" temperature was added to the MRF at the laboratory's request. We will check about adding S/N but this appears to be a record keeping requirement and a number of laboratories have asked us to remove this type of thing as there are separate log books to capture this information.

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82	Add 4 - RTCR	What is "Report to Client By:" and why is it necessary? TCEQ	MRF Form 10525	This is an important component of the MRF from a regulation perspective. It sets the 24-hour time clock for the PWS to resample.
83	Add 4 - RTCR	Clarification needed: If the sample type is Repeat or Raw, include the lab sample ID of the originating positive below". Positive Raw samples won't usually have an originating positive sample from which to get an ID. Unless it's a replacement sample for a previous Positive Raw, and in that case it may have several ID #s	MRF Form 10525	This will be clarified in the final document. Replacement samples are required for samples that have been previously rejected, not for positive samples.
84	Add 4 - RTCR	There isn't an area for documenting the Notification for Positive or Unsuitable Sample on MRF. Please provide area as this missing info could result in an audit finding	Form 10525	This will be addressed on the final TCEQ form.
85	Add 4 - RTCR	On the bottom right corner and just right of center there is a place to put rejection codes and document a reason for rejection. Maybe adding an asterisk in both places with a comment in the bottom corner guiding the laboratories to the "*Laboratory Guidelines for Microbial Reporting Form (MRF, #10525)* will help the drinking water program. The guidelines document lists all the rejection codes the labs are able use and prescribes all the mandatory items the drinking water program wants from labs. Since there is multiple links to different documents online, this comment may gear laboratories to read the other documents in full and hopefully the program will get all the required information it needs.	Form 10525	We will add a reference to the instructions on the final TCEQ form.
86	Add 4 - RTCR	While the QAPP is still under revision, please incorporate a request for labs to submit the results of all repeat samples (positive and negative) on the same day as the results are determined. Treatment Technique compliance should be conducted weekly and can't be done if the negative repeat samples are being submitted monthly.		A request will be added to Addendum 4 for laboratories to submit the results of all repeat samples (negative, in addition to positive) to the TCEQ on the same day results are determined, or the next business day. This will help the TCEQ determine treatment technique compliance in a timely manner.

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