

3. What minimum reporting limits are being proposed?

The Consumer Confidence Reports Rule (USEPA 1998i) requires that all detected regulated contaminants be reported in the annual reports, but detection is not defined for the DBP contaminants. This rule addresses the deficiency by proposing reporting limits for the regulated DBPs.

Laboratories that analyze compliance samples must be able to reliably measure the DBPs at concentrations below the MCL. Laboratories must also be able to measure the individual TTHM and HAA5 compounds at levels that are much lower than the MCLs for these compound classes, because the MCLs are based on the sum of the individual compound concentrations.

Historically, EPA has used practical quantitation levels to estimate the lowest concentration at which laboratories can be expected to provide data within specified limits of precision and accuracy during routine operating conditions (USEPA 1985). The estimates

are based on PE data, if available, or are set at five or ten times the method detection level.

In today's rule, EPA is proposing an alternate approach for establishing the lowest concentration for which laboratories are expected to report quantitative data for DBPs. The approach is based on a unique data set from the Information Collection Rule. Laboratories were required to meet specific quality control criteria when they analyzed samples for the Information Collection Rule. The rule established a regulatory minimum reporting level (MRL) for each analyte and laboratories were required to demonstrate they could accurately measure at these concentrations each time a set of samples was analyzed. The regulatory MRLs were based on recommendations from experts who were experienced in DBP analyses and were set at concentrations for which most laboratories were expected to be able to meet the precision and accuracy criteria under normal operating conditions. Most samples were also

expected to contain concentrations greater than the specified MRLs.

EPA evaluated the data from the Information Collection Rule to determine if the laboratories were able to reliably measure down to the required MRL concentrations. Precision and accuracy data from the calibration check standards prepared at the MRL concentrations (listed in Table V-21) were examined. The data indicated most laboratories were able to provide quantitative data for samples with these concentrations.

Because laboratories demonstrated the capability to meet the Information Collection Rule MRLs, EPA believes it is reasonable to expect similar performance during the analyses of DBP compliance monitoring samples. In today's rule, EPA is proposing to incorporate MRL requirements into the laboratory certification program for DBPs and to use regulatory MRLs as the minimum concentrations that must be reported as part of the Consumer Confidence Reports (§ 141.151(d)).

TABLE V-21.—PROPOSED MINIMUM REPORTING LEVEL (MRL) REQUIREMENTS

DBP	MRL (µg/L)		Comments
	Information collection rule	Proposed stage 2 DBPR	
TTHM			
Chloroform	1.0	1.0	
Bromodichloromethane	1.0	1.0	
Dibromochloromethane	1.0	1.0	
Bromoform	1.0	1.0	
HAA5			
Monochloroacetic Acid	2.0	2.0	
Dichloroacetic Acid	1.0	1.0	
Trichloroacetic Acid	1.0	1.0	
Monobromoacetic Acid	1.0	1.0	
Dibromoacetic Acid	1.0	1.0	
Chlorite	20.0	200.0	
Bromate	5.0	5.0 or 1.0	Laboratories that use EPA Methods 317.0 Revision 2.0, 326.0, or 321.8 must meet a 1.0 µg/L MRL for bromate.

As part of the request for certification, EPA is proposing to require laboratories to demonstrate they can reliably measure concentrations at least as low as the ones listed in Table V-21 in order to be certified for those parameters. This would mean that the calibration curve must encompass the proposed regulatory MRL concentration and that the laboratory must verify the accuracy of the calibration curve at the lowest concentration for which quantitative data are reported by analyzing a calibration check standard at that concentration prior to analyzing each batch of samples. (Laboratories would analyze a check standard at the

specified MRL concentration daily or each time samples are analyzed.) The measured concentration for this check standard must be within $\pm 50\%$ of the expected value. Laboratories may choose to report quantitative data at concentrations lower than the proposed regulatory MRLs as long as the required accuracy criteria ($\pm 50\%$ of the expected value) is met by daily analyzing standards at the lowest reporting limit chosen by the laboratory.

Laboratories were not given the opportunity to report concentrations lower than the specified MRLs during the Information Collection Rule. Some laboratories indicated they have met the

precision and accuracy criteria at lower concentrations, so EPA believes that each laboratory should have the flexibility to continue using its own reporting limits as long as the laboratory MRLs are not higher than the regulatory ones proposed in this rule. This flexibility would minimize the cost of implementing the regulatory MRL requirements, because the laboratory would not have to make changes in its established quality control procedures unless its procedures are less stringent than those being proposed today. Requiring a laboratory to adopt regulatory MRLs that are higher than the laboratory reporting limits currently in