

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF SAFE DRINKING WATER

Job Aid for Submitting Corrections to the Department

Background – How to avoid the need to make corrections:

The Department receives numerous corrections from accredited laboratories and Public Water Suppliers (PWSs) daily/weekly. The reason for corrections varies from typographic errors during data entry in DWELR to incorrect or incomplete information on Chains-of-Custody (COCs).

DWELR has data validation checks for many of the reported fields. The DWELR application features an error notification on the submission screen, an error report and correction function. DWELR will also send an email to all laboratory reporting contacts if any uncorrected errors remain on the 1st, 5th and 9th of the month. The email includes a phone number (717-772-4018) to call for assistance with correcting errors. At 12:01 AM on the 11th of each month, the reported data moves out of DWELR. Valid data transfers to the sample file for public review and compliance evaluation and invalid data transfers to a REJECT file. Typically, a record in the PADWIS REJECT file means that the submitter disregarded all error notifications.

The PWS and the laboratory submitting the results should be reviewing the data in DWELR prior to the 10th of the month by first checking that no records are in the DWELR error report, then by printing a copy of the records from the View and Edit Records function and carefully reviewing the data.

The accurate, and correct reporting of sample results is the responsibility of everyone associated with the collection and analysis of the samples. 25 Pa. Code §109.810(d) states "A laboratory accredited under Chapter 252 shall be responsible for the accurate reporting of data required under this section to the Department". Also, 25 Pa. Code §109.701(i) states "water systems are responsible for the accurate reporting of data." Water systems should review all data submitted by them or on their behalf each month. Failure to report accurate data within 10 days following the month in which the result is received will result in violations.

Submitting Corrections – Where they should be sent:

If corrections to data still need to be submitted, they should be submitted to the Department by the laboratory or DWELR user who submitted the data, via fax, email or mail as described below. Correction requests should not be made through the Department Sanitarian for the water system.

By fax:

The current Data Management fax number is 717-772-5630 and can be found by searching for document 3930-FM-BSDW0560 in eLibrary at the following link: http://www.depgreenport.state.pa.us/elibrary/Search.

By E-Mail:

Any emailed corrections must be sent to ra-padwis@pa.gov

By Mail: If you choose to mail your corrections in, the mailing/direct address for DEP's Central office are:

USPS
PA DEP SDWA MONITORING DATA
10th FLOOR RCSOB
PO BOX 8467
HARRISBURG PA 17105-8467

UPS or FedEx
PA DEP SDWA MONITORING DATA
10th FLOOR RCSOB
400 MARKET STREET
HARRISBURG PA 17101

If you are submitting a large volume of corrections, please first contact DEP's Bureau of Safe Drinking Water, PADWIS section at 717-772-4018 or ra-padwis@pa.gov.

Submitting Corrections: Documentation Required

1. Provide record of correction using one of the following two methods:

a. <u>Use Submission Report from DWELR View and Edit Records:</u>

The printer-friendly version of the original DWELR submission may be used for corrections. If using a DWELR printout:

- Strikeout or circle the incorrect information and write the correct information on the form. (Note: Do not strikeout the incorrect information heavily so that the original information cannot be read or faxed. Do not use a highlighter on forms to be faxed or copied.)
- Initial and date each correction.
- Provide full name, signature, today's date.
- Provide a brief explanation for the corrections.
- Provide your email address so that we will be able to notify you when your corrections have been processed.
- Note: 25 Pa. Code § 252.706(c)(2) states "Changes to records shall be made so that the original entry remains visible. The individual making the change shall be identified by name or initials, date of the correction and include the reason for the change unless correcting a typographical error. These criteria also apply to electronically maintained records."

b. Use Correction Forms from eLibrary:

If you do not have a DWELR printout, SDWA Correction forms are available on-line at http://www.depgreenport.state.pa.us/elibrary/Search. Enter "*SDWA*Correction*" in the Document Name field. Be sure to follow the instructions for the form.

- Enter all the correct information as it should have been submitted.
- In the 'Submitted' sections, only the incorrect information should be entered. This information is required to identify the record.
- Make sure your name, signature, date and reason for correction are included on the form.

25 Pa. Code § 109.810(c) states, "A laboratory accredited under Chapter 252 shall meet the requirements under subsections (a) and (b), regarding the results of test measurements or analyses performed by the laboratory under this chapter, unless the laboratory assigns in writing the responsibility for reporting and notification to another accredited laboratory."

If submitting a correction on behalf of another accredited laboratory, include a copy of the documentation that the lab conducting the analysis delegated the reporting responsibilities the lab requesting the correction (this should include the date the responsibility was delegated).

2. Provide Additional Documentation in Support of Correction Request:

In order to maintain the necessary documentation for data audit purposes in accordance with data accuracy provisions of Chapter 109 and Chapter 252, the Department requires additional information. The first bullet (diamond shape) under each correction type explains what type of information we need to be included with the correction request. The additional bullets underneath list possible reasons for the correction and information needed for each. Please note that the Department will review all additional information prior to making a correction. To facilitate the Department's review, you should provide as much information as possible. If sufficient justification is not provided, corrections cannot be made.

PWSID

- This cannot be corrected; record must be deleted.
 - Submit a request to have the original record deleted with signature and date.
 - Include COC to show the correct PWSID
 - Resubmit the data under the correct PWSID in DWELR.

Sample type/Sample location

- ❖ Written statement explaining the error, signature and date
 - Typographic Error
 - COC or copy of reporting log (for PWSs)
 - Error on COC
 - Corrected COC (struck-through and initialed)
 - Documentation from sample collector (if sample not collected by laboratory) that an error was made on the COC. This may include phone logs, emails, or other correspondence potentially with the system, third party collector, laboratory and Department.

Sample date

- Written statement explaining the error, signature and date
 - Typographic Error
 - COC or copy of reporting log (for PWSs)
 - Error on COC
 - Corrected COC (struck-through and initialed)
 - Documentation from sample collector (if sample not collected by laboratory) that an error was made on the COC. This may include phone logs, emails, or other correspondence potentially with the system, third party collector, laboratory and Department.

Sample time

- Written statement explaining the error, signature and date
 - Typographic Error
 - COC or copy of reporting log (for PWSs)
 - Error on COC
 - Corrected COC (struck-through and initialed)
 - Documentation from sample collector (if sample not collected by laboratory) that an error was made on the COC. This may include phone logs, emails, or other correspondence potentially with the system, third party collector, laboratory and Department.

Analysis date

- Statement explaining the error, signature and date
 - Typographic Error
 - Bench sheet
 - Error on bench sheet
 - Copy of written documentation between laboratory staff confirming the error.

Analysis method

- Statement explaining method used, signature and date
 - Typographic Error
 - Bench sheet
 - Error on bench sheet
 - Copy of written documentation between laboratory staff confirming the error.

The current Laboratory Reporting Instructions can be found at the following links: Chemical
Contaminants, Disinfectant Residuals/DPBs, Pb/Cu, WQPs, RADS, Turbidity, Crypto

Result

- Statement explaining the discrepancy, signature and date
 - Typographic Error
 - Bench sheet or copy of daily log
 - Error on bench sheet
 - o Copy of written documentation between laboratory staff confirming the error.

Contaminant ID

- Statement explaining what was analyzed/what the contaminant ID should be, signature and date
 - Typographic Error
 - o COC, Bench sheet or copy of reporting log
 - The current Laboratory Reporting Instructions can be found at the following links: Chemical
 Contaminants, Disinfectant Residuals/DPBs, Pb/Cu, WQPs, RADS, Turbidity, Crypto

Lab ID

- Signed and dated statement explaining the situation and why another LabID should be used OR
- Signed and dated statement from lab representative that LabID was used improperly
 - Typographic Error
 - o COC or bench sheet
 - The following links may be used to search for the correct LabID: <u>Accredited Laboratories</u>, <u>Registered Laboratories</u>