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| Subject: | Monitoring waiver request following an organic chemical detection | Orig Date: | 12/16/16 |
| Unit + init: | Technical Servcies (bd,rk) | Revised date: |  |
| Purpose & Scope: Provide guidance to staff on how to reduce monitoring after a one-time detection for a VOC occurs at a groundwater system.  |

Background: Oregon Administrative Rule (OAR) 333-061-0036(3)(b)(D) and -0036(3)(b)(D)(i) requires that a water system monitor quarterly at each sample point where a detection greater than minimum detection limit of 0.0005 mg/L has occurred.

The regulating agency (DWS or partner agency) may reduce the monitoring frequency to annual if results are reliably and consistently below the MCL for at least two quarters at groundwater system sample points.

If three consecutive annual samples are collected from the original sample point where the detection occurred and the results do not indicate a detection of the compound that was originally detected, the water system then may apply to the regulating agency for a waiver as described below.

Waiver Procedure/Process:

1. The water system must submit a request to have their monitoring waived. The request can be submitted by email, letter, or documented on the [VOC Waiver Request Following Organic Chemical Detection Form](file:///%5C%5CDHS.SDC.PVT%5CRoot%5COffices%5CPortland%20%28800%20NE%20Oregon%20St%29%5CDWS%5CProcedures%5CTech%20Services%20Procedures%5CVOC%20Waiver%20after%20Detection%20-%20Request%20Form%203-2018.docx).
2. Once the request for a waiver has been submitted to the regulating agency (DWS or partner agency), the agency would complete the remainder of the form, which includes answering the following questions (see Monitoring Waiver Request Following Organic Chemical Detection form for more details):
	1. What was the water system operator’s explanation for the cause of the detected chemical, such as well maintenance/alterations (e.g., pump repair/replacement, well deepening, new discharge piping, new electrical wiring, etc.)?
		1. Well maintenance/alterations are a potential sources of temporary contamination.
	2. Did any of the QA/QC samples (i.e., trip blanks, duplicates, field blanks, etc.) included with the entry point sample test positive for the same detected chemical or was another VOCs compound detected?
		1. The water system may be eligible for a monitoring waiver if QA/QC samples indicate that the entry point sample was invalid.
	3. Are there any documented releases of contamination in close proximity (i.e., 1-2 year Time of Travel or within 1,500 feet upgradient from the well) to the source that may have resulted in the chemical detection?
		1. Consult with your regional hydrogeologist to determine if there are sources of contamination that may have caused the chemical detection.
			1. If sources are present, then the system may not be eligible for a waiver.
	4. After the detection, was a confirmation sample collected?
		1. If a confirmation sample was collected within the same quarter as the original sample, the result must be averaged with the original sample result and the average will be used to determine compliance. Use zero for any non-detectable results.
	5. Was the detected contaminant previously detected at this water system?
		1. If yes, was the detection at the same entry point as the most recent detection and how much time separated the detections? If repeated detections of the same chemical compound occurred in the past, a monitoring waiver for detected chemical may not be granted.
	6. Was quarterly monitoring completed for the contaminant without any detections?
		1. If the system completed a minimum of two quarters of monitoring and the results are reliably and consistently below the MCL, then the system may be eligible for an annual schedule.
	7. Was at least three years of annual monitoring completed for the contaminant without any detections?
		1. If the system completed three years of annual monitoring and no new detections for VOCs have occurred, then the schedule may be reduced to a 3 year schedule.
	8. Waiver Conditions and/or Comments:
		1. If warranted, conditions (for example, waiver expiration date, recommendations when samples should be collected, additional sampling required prior to the waiver being granted, etc.) and/or comments.
3. After the form is completed and reviewed, the regulating agency will determine if the system is eligible for a waiver.
	1. If the system is eligible for a monitoring waiver, the regulating agency will submit [Chemical and Bacteriological Monitoring Schedule Change Form](http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/Partners/Documents/inventory/chemical-schedule-change.docx) to DMCE for data entry.
	2. If the system is not eligible for a waiver, the system will remain on the current annual monitoring schedule.