



Invalidation of Drinking Water Samples

DWCAS - CDPHE, CDPHE <cdphe_dwcas@state.co.us>

Fri, Oct 7, 2016 at 10:51 AM

Message to Colorado public water systems and operators from Ron Falco, P.E., Safe Drinking Water Program Manager

Hello-

We are sending this communication to provide Colorado public water systems and operators with clarification regarding authority for the invalidation of drinking water samples under the *National Primary Drinking Water Regulations*, 40 CFR 141 (NPDWR) and the *Colorado Primary Drinking Water Regulations*, 5 CCR 1002-11 ("Regulation 11"). A similar clarification was provided to the Colorado drinking water certified laboratories.*

Invalidation of drinking water samples can only be done by the Water Quality Control Division, except in very specific circumstances for total coliform samples that are discussed below. **In all other circumstances, certified laboratories do not have authority to invalidate drinking water samples.**

Specific Circumstances for Lab-Invalidation of Total Coliform Samples -

Regulatory Citations: NPWDR, 141.21(c)(2), Regulation 11, Section 11.16(8)(d)

Certified laboratories are required to invalidate total coliform samples that have a negative result under one or more of the following circumstances:

- § The sample produces a turbid culture in the absence of gas production using an analytical method where gas formation is examined (e.g., the Multiple-Tube Fermentation Techniques).
- § The sample produces a turbid culture in the absence of an acid reaction in the Presence-Absence (P-A) Coliform Test.
- § The sample exhibits confluent growth or produces colonies too numerous to count with an analytical method using a membrane filter (e.g., Membrane Filter Techniques).
 - "CONFLUENT GROWTH" means, in the context of bacterial testing, a continuous bacterial growth covering the entire filtration area of a membrane filter, or a portion thereof, in which bacterial colonies are not discrete.
 - "TOO NUMEROUS TO COUNT" means that the total number of bacterial colonies exceeds 200 on a 47-millimeter (mm) diameter membrane filter used for coliform detection.

By December 10, 2016, water systems are required submit the results for all samples that have been incorrectly invalidated since January 1, 2016. Public water systems are encouraged to communicate with their certified laboratories as soon as possible with any questions about any samples that were incorrectly invalidated since January 1, 2016.

Please submit the report provided by the laboratory and the [state reporting form](#) using the [Portal](#). **Add comments about the invalidation in the form and when submitting through the Portal.**

If a laboratory receives a sample for analysis that it does not believe meets the criteria for a sample per the approved analytical method(s), the sample should not be analyzed.

*Please note that the notification to the laboratories included a typographical error and had the incorrect deadline date for water system submittal of incorrectly-invalidated sample results. For those water systems that also have a certified laboratory and received that communication, please refer to the information in this email. We apologize for any confusion.

--

This is an automated email.

Please do not send emails to this address (it is not checked by a person).

CDPHE - Safe Drinking Water Program

Portal: <https://wqcdcompliance.com/login> | [Contact Us](#)

24-Hour Emergency: 1-877-518-5608 | TC or EC Positive or High Nitrate: 303-692-3308