



# Florida Department of Environmental Protection

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## MEMORANDUM

**TO:** DEP District and Approved County Health Department Offices

**FROM:** Source and Drinking Water Program

**SUBJECT:** Clarification of Rule 62-550.822 Disinfection Byproducts (DBP) Requirements: Total Trihalomethanes (TTHM) and Haloacetic Acids (HAA5)

**DATE:** May 10, 2018

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Scheduling Requirements for Quarterly Monitoring (62-550.822, F.A.C.)

For systems that monitor quarterly, regulatory offices must review DBP monitoring plans to identify the specific week of the quarter that will be sampled. For systems on annual monitoring, schedules must designate the specific month that will be sampled.

Clarification:

- a. 62-550.822 F.A.C adopted 40 CFR 141, Subpart U (Section 141.600-141.605) and 40 CFR 141, Subpart V (Section 141.620-141.629).
- b. As stated in Subpart V in 40 CFR 141.621(a)(2) Footnote 2, Subpart U in §141.605(b) Footnote 2 and §141.605(e), systems on quarterly monitoring must sample every 90 days. The 90-day rule was developed to allow an equal amount of time between sampling. It is understood that there are more than 90 days in some quarters and that a specific day may fall on a weekend in certain years. To work with these factors, facilities can collect samples during the designated week of monitoring. For example: the 2<sup>nd</sup> week of the 2<sup>nd</sup> month for each quarter.
- c. Samples used for compliance purposes must be designated in the system's State approved monitoring plan. Systems may collect more than the required number and frequency of sampling. However, in order to be used in the calculation of the quarterly average used for compliance purposes, the additional samples must be included in the monitoring plan and approved prior to collecting samples. Consideration should be given to assuring that the sampling is equally separated.
- d. The definition of "normal operating conditions" include any routine maintenance practices. An event such as a chlorine burn, a switch from chloramine to chlorine, is considered to be part of the normal operations of a system for periodic maintenance. A water line break or other disruptive event which is outside the control of the facility is considered non-normal operating condition.
- e. The length of chlorine burns should be kept to a maximum of 21 days. Whenever possible, systems should try to optimize processes using guidance such as AWWA manual "A Guide for the Implementation and Use of Chloramines" (2004).