

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GUIDANCE FROM HOTLINE COMPENDIUM

WSG H50
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SUBJECT: Recordkeeping Requirements for Radionuclides

SOURCE: Greg Helms, OGWDW

Title 40 CFR 141.33 establishes recordkeeping requirements for public water systems concerning bacteriological and chemical analyses. Section 141.33 (a) specifies that bacteriological records must be kept at least five years and chemical analyses at least 10 years. However, there is no specific language addressing the length of time radiological records must be maintained. Furthermore, the proposed Radionuclides Rule of July 18, 1991 (56 FR 33050) does not contain any language that would modify 40 CFR 141.33 - Record maintenance.

Has EPA specified recordkeeping requirements for radionuclide analyses?

Response:

In terms of the recordkeeping requirements promulgated in 40 CFR 141.33, EPA considers radionuclides to be chemical contaminants. Therefore, public water systems must keep records of radionuclide analyses at least 10 years.