

The Idaho Drinking Water Newsletter

Department of Environmental Quality Idaho Drinking Water Program

www.deq.idaho.gov/water/prog_issues.cfm

June 2010, Number 56

Attention community and non-transient non-community water systems

Reviewing the requirements for a lead public education program and public notifications

The purpose of the Lead and Copper Rule (LCR), and the rule's 2007 Short-Term Revisions, is to protect the consumers of public water systems from exposure to lead and copper in drinking water. This article emphasizes the lead public education requirements of the rule since there are no comparable requirements for copper.

The LCR requires community and non-transient non-community water systems to monitor lead and copper levels at the taps of consumers who have volunteered to participate in the testing program.

Determining the Action Level (AL)

Utilities must ensure that water from the customer's tap does not exceed the "action level" (AL) for lead of 15 parts per billion (ppb) in drinking water in at least 90 percent of the taps sampled. This means that if 90% (i.e., 9 out of 10) of the samples taken are below the AL, then the system is in compliance. In other words, no more than 10 percent of the samples may exceed the 15 ppb lead AL.

During the first year of sampling, each water system must complete at least two consecutive 6-month Standard Monitoring periods during which, it must collect at least one tap sample from each of the selected sites to determine the action levels.

If the lead AL is exceeded (i.e., more than 10% of the samples exceed 15 ppb), it triggers "actions," which a public water system must follow such as *public education requirements outlined below*. No public education is required, if the copper AL of 1.3 parts per million (ppm) is exceeded.

LCR's lead "sample results" & "public education" requirements

Provide sample results to each homeowner. You must notify the participating consumers of the tap results of the lead monitoring tests, **within 30 days** of receiving the lab results, *even if the sample does not exceed the lead "action level."*

DEQ has provided system owners with a consumer notice template for notification of tap monitoring results, which contains the required public education information, plus a separate certification form which must be sent to DEQ certifying, **within 10 days**, that you met the requirements. (See *notice template and certification forms at DEQ's Public Switchboard* - www.deq.idaho.gov/Applications/SDWISReports/pws_pub_notify_index.cfm.)



A lead AL exceedance requires public education requirements. If during a monitoring period, more than 10 percent of the tap water samples collected exceed the AL of 15 parts per billion (ppb), you must conduct a "public education program."

"Public education" means that system owners must notify customers that the AL was exceeded, as well as deliver public education information (about the dangers of lead and how to reduce its health risks) **within 60 days** after the end of the monitoring period in which the exceedance occurred. (For your use, DEQ's Switchboard provides an AL exceedance public education notice template, plus education handout suggestions at www.deq.idaho.gov/Applications/SDWISReports/pws_pub_notify_index.cfm.)

Please note, when the lead action level is exceeded, there is no requirement to issue a public notification, – the public education program above takes the place of a public notification for AL exceedances.

LCR "public notification" (PN) requirements

Public notifications for the LCR generally fall into a Tier 2 or Tier 3 category and must be issued by the system owner **within 30 days** of the violation.

In general, lead public notification is required for the following violations:

- Failure to monitor for lead and copper.
- Failure to provide customers with the required "public education" cited above.
- Failure to install a required optimal corrosion control treatment, or failure to submit a control treatment recommendation or plan to DEQ.

These lead public notification templates are available for system owners to use at www.deq.idaho.gov/Applications/SDWISReports/pws_pub_notify_index.cfm.

Remember, you can also use EPA's PNWriter at www.pniwriter.org/ to issue your public notifications.

For more information:

- DEQ's Issue #51 of the *Idaho Drinking Water Newsletter* covered the lead public education and public notification in more detail - www.deq.idaho.gov/water/assist_business/pws/H2O_newsletter_51.pdf.
- EPA's public education templates are located at www.epa.gov/safewater/lcrmr/compliancehelp.html. ■

PNWS-AWWA is updating Cross Connection Control Manual

DEQ's Drinking Water Program is accepting comments

The Cross Connection Control Committee of the Pacific Northwest Section of the American Water Works Association (PNWS-AWWA) is currently in the process of updating the sixth edition of the association's Cross Connection Control Manual - Accepted Procedure and Practice (aka "the Yellow Manual"). The manual is a widely accepted reference for cross connection control.

DEQ's Mike Piechowski, Drinking Water Staff Engineer, is a member of the CCC Committee and is accepting comments, suggestions, or requests for changes to the manual at mike.piechowski@deq.idaho.gov or 208-373-0274. ■

2011 grant guidelines available next January

DEQ awards funding for Source Water Protection efforts

The Department of Environmental Quality (DEQ) awarded over \$160,000 in grant funding for source water protection efforts this month through the Source Water Protection Grant Program.



Funding for the competitive grant program was made available through the State Revolving Fund Capitalization Grant.

Eligible applicants included Idaho public drinking water systems, local governments (cities or counties), special districts (e.g., soil conservation districts), associations, nonprofit organizations, and educational institutions. DEQ received 38 grant applications and was able to fund 13 projects.

Grants were awarded to implement projects to protect existing sources of public drinking water. Examples of projects funded this year include security fencing around drinking water sources, decommissioning wells that pose a risk of contamination, household hazardous waste collection pilot program, watershed-wide drinking water protection planning efforts, and county education efforts including education on maintenance of onsite wastewater systems and outreach to support a county overlay district to protect critical source water areas.

The grant guidelines for the 2011 Source Water Protection Grant will be announced in January 2011. For a list of funded projects and for more information on the Source Water Protection Grant Program, visit DEQ's website at www.deq.idaho.gov/Applications/gwga2010/ or contact Amy Williams at (208) 373-0115. ■



Remember, the Idaho Drinking Water Newsletter is available in electronic and hard copy formats. To view the newsletter online, go to

www.deq.idaho.gov/water/assist_business/pws/newsletters.cfm.

Monitoring reminder to public drinking water systems - check your schedule!

2010 is the last year in the 3 & 9-year monitoring periods

① To ensure that your Drinking Water monitoring is completed in a timely manner, check the “Monitoring Schedule” report on the Public Water System Switchboard at www.deq.idaho.gov/Applications/SDWISReports/pws_index.cfm.

② Once you are at the “Monitoring Schedule Report” screen, use the drop-down list to select your Public Water System (PWS). Click the “Use Current Year” button to fill in the date range and then click “submit” to see your monitoring schedule for the year.

Idaho Drinking Water Program
Public Water System - Switchboard

* Note, this site is designed to be used with the latest version of Internet Explorer

Rules	Tools / Data	Forms / Information	System Class / Licensing	Financial Assistance
Idaho Drinking Water Rules IDAPA 58.01.08	CCR Report Tool	Newsletters	System Classification Requirements	Operator Reimbursement
CFR 40 Parts 136-149	Monitoring Schedule	Plans and Specifications	Operator Licensing Info	Pay Assessment Fee Online
EPA - Quick Reference	Source Water Assessment Reports	Public Notification Templates	Become an Operator for Hire	Source Water Protection Grant Due by 3/19/2010
	Drinking Water Watch	Sanitary Survey Form	Search for an Operator	

Monitoring Schedule Report

Analyte Group Codes Reference

Monitoring Schedule for a Single PWS:

End Date Range:

From: 01/01/2010

To: 12/31/2010

submit

Use Current Year

Use Current Year + 2 years

Note: Report will take about 5 minutes or less to run.

Avoid unnecessary monitoring and lab costs – check your schedule before sampling

Some systems pay for lab tests that are not due or not needed

Some DEQ regions are reporting that, after reviewing water system monitoring lab reports, they have noticed that a few systems are paying for tests that were not due, or that they did not need.

As an example, one small water system apparently did not check their monitoring schedule before sampling. The result was the system spent over \$500 in lab fees for a set of contaminant analyses, which were not due and would have to be tested over and paid for again at a later date, i.e., “the due date.”

In another incident, a water system wanted to test for one specific inorganic contaminant, but paid for a full spectrum of analytes not realizing that you could request laboratory tests for single contaminants. *(DEQ does not discourage drinking water systems from monitoring above and beyond what is required, but for many systems budget constraints may require that testing be limited to only what is required.)*

A few systems have even sampled for contaminants for which they had been granted monitoring waivers – meaning that because of the waiver that they did not have to monitor and pay for those particular contaminants.

In short, it pays to carefully check your monitoring schedule before sampling because it identifies which sources and which contaminants must be sampled for and when – you may save your system some money. A few systems even include their monitoring schedules with the samples they are sending to the laboratory.

Remember, **you can check your “Monitoring Schedule” report on DEQ’s “Public Water System Switchboard”** at www.deq.idaho.gov/Applications/SDWISReports/Output/M1/Pre_M1_Report.cfm.

If you have monitoring questions or need a clarification, always check with either your local DEQ regional office, or district health department *before* sampling. ■

An on-going issue for some systems

Taking the time to fill out drinking water request lab forms correctly can prevent a violation

Failing to completely fill out laboratory drinking water request forms, and to fill them out correctly and legibly, is a common problem among public drinking water systems.

Taking the time to double-check your lab request forms to make sure all blanks are filled in is very important because by doing so, you can prevent delays of sample results and possible violations for “failing to monitor.” Here are some general reminders for submitting lab samples:

- **Ensure that the entire lab form is filled out completely** – the lab form accompanying the sample container must be completed in detail. Missing information could lead to a rejection of your submission, which could result in a violation.
- **Print clearly** – illegible lab forms could delay or prohibit processing.
- **Always provide the system name and the PWS number** – failure to provide complete identification could result in the sample being rejected.
- **Clearly identify sample locations** – the most common lab report errors tend to be vague sample locations such as “Well” or “Manifold.” Sample locations should match those on your “Monitoring Schedule Report” as found at www.deq.idaho.gov/Applications/SDWISReports/Output/M1/Pre_M1_Report.cfm. Contact your DEQ regional office for questions regarding sample requirements.
- **Enter a contact telephone number** – the lab may need to notify you if there is a problem with your sample.
- **Provide the date and time** of sample collections.
- **For repeat bacterial samples**, enter the date of the original positive test and appropriate sample type codes: P=Original Location; U=Upstream; D=Downstream; X=Other; and S=Routine or RS=Routine (depending on the lab).
- **A separate form for each water sample** submitted is a requirement.
- **Keep a copy of the completed form** for your records – this recommendation may save some time if a question arises about your lab submission.

A sample bacterial analysis lab form.

Incomplete lab forms affect laboratories and regulatory staff

An incomplete lab form not only affects public water systems and their customers. For example, laboratory reports are considered legal documents, and any report changes or corrections require extensive documentation and additional work for the laboratory’s staff as well as regulatory staff, i.e., DEQ regional staff and health district personnel. *As a note, regulatory personnel may reject incorrect, incomplete, or illegible reports, which could result in violations.*

All drinking water violations require public notice

Remember, submitting an incomplete lab request form may mean that your sampling form is rejected, and this could lead to a failure to monitor violation. If this situation occurs, the system must notify its customers that it failed to monitor. Submitting a complete lab form may keep you from having to issue a public notification.

Questions?

If you have questions on the submittal forms call your lab. For sample requirements, contact your DEQ regional office. A list of state approved labs is available at www.deq.idaho.gov/water/prog_issues.cfm#Drink - click on “Certified Laboratories”.

IDSE Report due July 1, 2010 for community water systems serving less than 10,000 people

Initial Distribution System Evaluation: Tracking chlorination's disinfection byproducts

The Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBP) was developed to reduce potential cancer, reproductive, and developmental health risks from disinfection byproducts (DBPs) in drinking water.

The Stage 2 Rule applies to all community water systems (CWS) of all sizes and non-transient non-community water systems (NTNCWS) serving 10,000 people or more, which disinfect by any means other than ultraviolet light. 

Explaining IDSE

Under the rule, the targeted water systems above are required to conduct an evaluation of their distribution systems, known as an **Initial Distribution System Evaluation (IDSE)**, to monitor and identify the locations with high disinfection byproduct concentrations. (**Note:** *NTNCWSs serving less than 10,000 people are exempt from the IDSE.*)

A water system sampling plan is required to document the methodology of the monitoring process, and the IDSE report follows the completion of those monitoring efforts. Depending on population served, the reports were due at different intervals starting January 1, 2009.

The last IDSE report (aka "Schedule 4") is required for those community water systems serving *less than* 10,000

people, which were required to complete "Standard Monitoring" under the Stage 2 DBP Rule, or conducted a "System Specific Study (SSS)." The IDSE report is **due in your local DEQ regional office by July 1, 2010**. The report may be sent electronically.

* Important Note:

If you are a system that received a "40/30 Certification" or a "Very Small System (VSS) Waiver," you are exempt from the IDSE requirement.

If you are not sure whether or not you received one of these exemptions, contact your DEQ regional office.

Need some assistance?

See EPA's "How to Complete an IDSE Report in Region 10" at <http://yosemite.epa.gov/R10/WATER.NSF/drinking+water/IDSEreports>. This IDSE site contains self-explanatory templates to assist you in completing your report. Also contact your local DEQ regional office, if you have questions.

For general IDSE information, go to EPA's

"Stage 2 DBPR IDSE Standard Monitoring Factsheet" at www.epa.gov/safewater/disinfection/stage2/pdfs/fs_sm_fact_sheet_final.pdf. ■

Internet Listing of Licensed Contract Operators for Hire



- **DEQ maintains a list of all individual licensed contract operators**, available for hire, who have requested to be listed. See the list at www.deq.idaho.gov/Applications/WWDWOper/WWDWSearchContractOperatorInfo.cfm.

Once into the directory, go to "License Type" and select the license category you are interested in and hit "Continue." It is not necessary to select city or state.

- **Want to be added to the list?** Operators who meet the minimum contract operator requirements and wish to be added to the DEQ list of available contractors, should go to "WW/DW Contract Operator Information" at www.deq.idaho.gov/Applications/WWDWOper/WWDWOperatorAcceptDisclaimer.cfm.

Please Note: DEQ does not endorse any contract operator.

A reminder to all community water systems:

Calendar Year 2009 CCRs are due July 1, 2010

The updated Consumer Confidence Report (CCR) templates and instructions are available on the DEQ web sites below:

- General instructions are located at www.deq.idaho.gov/water/assist_business/pws/ccr.cfm.
- 2009 templates (DEQ or EPA), the CCR Report Writing Assistance Tool, and your system's sampling and violation records for 2010 are at www.deq.idaho.gov/water/prog_issues/drinking_water/CCR/ccrwip.cfm.

DEQ mailed a CCR reminder postcard to all community water system owners in March 2010.

Training Schedule

Class/Sponsor	Location/Date
Crew Leader (BE) - W/WW	Orofino, 06/01/10
Water I & II Licensure Review (BE) - W	Lewiston 06/02-03/10
History/Techniques of Water Treatment (IRWA) - W	Coeur d'Alene, 06/03/10
Pumps & Motors (BE) - W/WW	Idaho Falls, 06/08/10
Large Soil Absorption Systems (BE) - WW	Idaho Falls, 06/09/10
Lagoons Operation & Maintenance (BE) - WW	Meridian, 06/17/10
Troubleshooting Motors & Controls (BE) - W/WW	Boise, 06/22-23/10
Automatic Control Valves (IRWA) - W/WW	Idaho Falls, 07/13/10
Automatic Control Valves (IRWA) - W/WW	Caldwell, 07/15/10
Pumps & Motors (BE) - W/WW	Boise, 07/20/10
Large Soil Absorption Systems (BE) - WW	Boise, 07/21/10
Collections III & IV Licensure Review (BE) - WW	Idaho Falls, 07/27-28/10
Cross Connections Basic (BE) - W/WW	Grangeville, 08/04/10
VSWS Licensure Review (BE) - W	Post Falls, 08/07/10
Water Tank Maintenance (BE) - W	Paul, 08/10/10

Class/Sponsor	Location/Date
Disinfection (BE) - W/WW	Paul, 08/11/10
Wastewater III & IV Licensure Review (BE) - WW	Pocatello, 08/18-19/10
Crew Leader (BE) - W/ WW	Idaho Falls, 08/31/10
Buried Treasure (BE) - W	Twin Falls, 09/01/10
Small System O&M (BE) - W	Boise, 09/02/10
Collections I & II Licensure Review (BE) - WW	Lewiston, 09/07-08/10
Water Treatment Optimization (BE) - W	Coeur d'Alene, 09/09/10
Lagoon Operation & Maintenance (BE) - WW	Idaho Falls, 09/22/10
Lab QA/QC (BE) - WW	Idaho Falls, 09/23/10
Intro to Sampling/Distribution System Monitoring (BE) - W	Twin Falls, 09/28/10
Intro to Sampling/Distribution System Monitoring (BE) - W	Nampa, 09/30/10

(BE) = Brown Environmental, Inc. 1-800-543-4358
or for the Boise area, 1-208-465-5725.
Web site: www.idahooperatortraining.com/

(IRWA) = Idaho Rural Water Association 1-800-962-3257
or 1-208-343-7001, Fax: 1-208-343-1866. E-mail: irwa@idahoruralwater.com.
Web site: www.idahoruralwater.com/training.aspx

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