



Meeting Notes
Drinking Water Advisory Group
September 9, 2019

Agenda Item	Notes
<p>2. ODW Updates Derek Pell, Deputy Director of Operations</p>	<ul style="list-style-type: none">◆ King County Jail Struggling with Lead Fixtures<ul style="list-style-type: none">○ Issued bottled water advisory inside building, making news.○ Seattle Public Utilities, Public Health Seattle, and King County are well prepared.○ Wake-up call to utilities about how older building management impacts public perception.◆ Kids swimming in 2.5 Million Gallon Stand Pipe YouTube Video<ul style="list-style-type: none">○ Snohomish, Washington.○ No one hurt.○ City immediately isolated reservoir and took it off service. They used broad range coliform and disinfection monitoring.○ No Health Advisory issued, but focused on stand pipe security.○ YouTube video taken down, KING 5 and KIRO news have the video..◆ Office of Drinking Water Budget<ul style="list-style-type: none">○ Still in the black, with reduced staffing. (Working on that one for the long run.)○ Office of Drinking Water has a few key positions vacant:<ul style="list-style-type: none">▪ Actively hiring Northwest Regional Office Assistant Manager; SRF Cultural Reviews Specialist, AA4 Administrative Assistant.▪ Public Information Office, Liz Coleman left, this may impact utilities with Health Advisories.○ If you have any questions or concerns about linking up with a public information officer, contact Derek Pell.◆ 2020 Environmental Public Health Decision Package<ul style="list-style-type: none">○ Department of Health is requesting spending authority on some of our funds in next legislative session.○ We have the funds but not the authority to spend them.○ By increasing authority to spend we may be able to fund a number of items:<ul style="list-style-type: none">▪ Funding for consolidations.▪ Increasing loan awards.▪ Group B Program.◆ EPA Audit<ul style="list-style-type: none">○ EPA coming to Washington state at the beginning of November.○ Auditing all of the primacy programs.○ Selecting 25–30 water systems in the state, looking at compliance relative to all aspects of the Safe Drinking Water Act.○ We will make our data systems completely available to EPA staff and their consultants. We will also look at all of our program-specific data.○ We have a great story to tell, and opportunities to close some gaps.



	<ul style="list-style-type: none">◆ 2020 Drinking Water Infrastructure Needs Assessment<ul style="list-style-type: none">○ Last done in 2015.○ Opportunity for states to pitch infrastructure needs to EPA so that State Revolving Loan dollars can be allocated across the country.○ If you don't do the needs assessment you only get 1 percent of the money that congress allocates.○ If you do the needs assessment you are then scored and ranked with all the other states.○ Our goal is to show the need within Washington state.○ All systems over 100,000 population will be surveyed.○ A sample of the small and medium systems that are put together to discuss the needs.○ Nancy Feagin and Sam Perry are working with EPA to discuss how this will be done successfully across the country.
<p>3. Manganese Update and Group Discussion Sam Perry, Engineering</p>	<ul style="list-style-type: none">◆ Element 25, essential nutrient, important for bone growth. Traditionally not a health concern—aesthetic concern for taste and color.◆ Recent health effects research:<ul style="list-style-type: none">○ Absorption through water is different than absorption through food.○ People under 6 y.o.—affects hyperactivity and mental abilities.○ Older people—increased risk of disease similar to Parkinson's.◆ EPA recommended health advisory level 0.3, 1.0 mg/L.◆ Increase in manganese correlates with decrease in IQ—200 ug/L corresponds to about 5 IQ points.◆ Recommend:<ul style="list-style-type: none">○ Maximize treatment effectiveness (target 20 ppb or less).○ Reduce exposure from pipes (flushing, pipe replacement, etc.○ Plan ahead for changes (beware of disrupting Mn in pipes).<ul style="list-style-type: none">▪ Hydraulics, source, treatment.○ Changes in Manganese communications.<ul style="list-style-type: none">▪ Discolored water—don't tell customer it's just a nuisance unless you're sure.▪ We updated our publications to remove "<i>manganese does not pose a threat to human health.</i>"◆ West Point, NE has a do not drink advisory due to Mn at 1mg/L. Pierre, SD has similar. High Country News article—Mn exposure in Utah.◆ Anything we need to have in place to be successful in talking about manganese in water?◆ Question: Will the presentations be available online? Answer: Yes, on the DWAG Website◆ Tom Bell-Game (HDR): 20 ug/L is in line with AWWA WRF recommendations.



	<ul style="list-style-type: none"> ○ Is there effort toward moving this into a primary MCL? (Sam hasn't heard anything, but is being monitored through UCMR4. Perchlorate took decades to move from UCMR1 to MCL. ◆ Scott Hallenberg (Tacoma Water): How can we monitor Mn in the distribution system? ◆ Ken (Lakehaven Water): is there more than one study? I would like to see more studies supporting this. ◆ Mike Kroutkramer (Robinson Noble): Manganese Oxide—is that a risk? Is there a difference in toxicology? Turbidity events when MnO₂ shakes free? What's the risk of particulate Mn? ◆ Bob James: UCMR4, Marysville found 1.4 mg/L in their spring after years of getting results well below the standards. <ul style="list-style-type: none"> ○ We should develop protocols, pay attention to how samples are collected. Reproducible results. Sensitivity to flushing or other actions that lead to non-representative or non-reproducible results. ◆ Doug Hale: Mandatory language for Consumer Confidence Reports. ◆ Washington National Guard. <ul style="list-style-type: none"> ○ Sampling, very important to distinguish between source and distribution. ○ Fe/Mn level in distribution can be much higher than source. ○ Pay attention to customer protection. ○ What is the end goal in this discussion? ○ No funding if this isn't identified as a primary MCL. [DOH DWSRF construction loan guideline provide Category 3 level funding support for projects addressing manganese above EPA health reference level]. ◆ Heather Kibby (WASWD): Provide help for private well owners. ◆ Drew Noble: Are we going to have further guidance to help us when this hits the internet? We don't want to develop messages ourselves (unified messaging from ODW).
<p>4. Lead and Copper Rule Implementation and Group Discussion Kay Rottell</p>	<ul style="list-style-type: none"> ◆ Implementation changes: <ul style="list-style-type: none"> ○ Sampling collection <ul style="list-style-type: none"> ▪ First draw, after 6-12 hours, from cold water taps. ▪ From June to September you NEED to get your lead and copper samples in. Next year, we will stop accepting samples outside of that period. For schools not open during that timeframe, we can make exceptions on a case-by-case basis. ○ Questionnaire for homeowners collecting samples. <ul style="list-style-type: none"> ▪ Regularly used tap? Consider stagnation time, plumbing repairs, use of water softeners. ○ Treatment Monitoring <ul style="list-style-type: none"> ▪ LCR tap samples—two consecutive six-month steps.



	<ul style="list-style-type: none"> ▪ Small Systems: Entry Point: pH, alkalinity, inhibitor concentration (if used), chemical dosage (if used). ▪ pH minimum must be greater than or equal to 7.0. ○ Not consistently implemented in the past, going forward, we will implement. <ul style="list-style-type: none"> ▪ ODW to set OWQPs using actual WQ in system. ▪ Take info from operation, if not available, take info from design. ▪ Large or small, medium systems that exceed action level and have treatment must continually collect OWQPs. ▪ Failure to do so is a TTV. ▪ If you exceed OWQP one day, take another sample immediately because we'll consider you to be exceeding until we receive the next adequate result. ○ Any New or Change in source Treatment <ul style="list-style-type: none"> ▪ Need to evaluate for corrosion impacts to the system. Submit project change to us and recommend follow up actions. ▪ You should know pH, alk, ORP, chlorine residual, inorganics (Fe, Mn, Al, Cl, SO4) at entry point. ▪ How does it affect new source? ◆ WQP Report <ul style="list-style-type: none"> ○ Developed draft from to bring some issues to attention. We welcome comments. ○ Question: Clarification on notifying ODW on any changes being made? Answer: You have to notify us prior to any change as required in state regulations. Additionally in LCR includes notification when you have a change in coagulants at a treatment plant. ○ Question: Isn't this data already captured in the monthly surface water treatment reports? Answer: Surface water reports require you to report your lowest pH result for compliance with CT requirement the LCR requires the average of the day for compliance with your optimal WQPs. You may be required to submit pH both monthly on your MORs and every six months for LCR requirements. ○ Question: Basically for small systems under 100 connections we will not have to do this all the time and you will tell us when you want it? Answer: Yes and yes. Only systems over 50,000 people served will have to routinely submit WQP data. ○ Question: How does this help with Corrosion Control? Answer: A stable pH ensures you have optimal corrosion control, collecting pH at entry point and distribution will determine if it is working.
<p>5. America's Water Infrastructure Act Brian Sayrs</p>	<ul style="list-style-type: none"> ◆ Capacity development strategy: Asset management, encourage and assist. ◆ Asset management as part of capacity development strategy. We're required to engage systems about how they develop their capacity and how they implement asset management.



	<ul style="list-style-type: none">◆ Funding—DWSRF (AIS, prevailing wage capitalization, subsidies); and ODW funding (public water system supervision grants).◆ Lead. Schools/child care—PWS customers may ask for assistance and guidance.<ul style="list-style-type: none">○ Lead service lines in needs assessment.◆ After 9/11—resiliency assessments were required of large systems.<ul style="list-style-type: none">○ Certify risk and resiliency assessment.○ Update emergency response program within six months.○ Our ER response person out of office at this time. However, there are all-day webinars about water resiliency. Emergency response—risk and resiliency (vulnerability assessments).<ul style="list-style-type: none">▪ epa.gov/waterresilience▪ Conduct a risk assessment (VSAT)▪ Develop emergency response plans▪ Find training opportunities
6. UIC Final Language Update and Group Discussion Frank Baird	<ul style="list-style-type: none">◆
7. Compliance assurance and Enforcement Update Jacqui Brown Miller	<ul style="list-style-type: none">◆ ODW has primacy authority under federal SDWA.<ul style="list-style-type: none">○ RCW 70.119A.080 & 2015 Public Water Supply Supervision Grant Work Plan, Health/EPA, October 2015.◆ Group A systems required to:<ul style="list-style-type: none">○ Not exceed MCL for various contaminants.○ Meet min. water quality monitoring standards○ Report.○ Provide PN to customers○ Hire qualified professionals.○ Detect and treat for specific contaminants.◆ EPA directly administers SDWA.◆ 4,079 Group A systems subject to fed. requirements◆ 72%+ had zero federal infractions.◆ Roughly 50% of violators are very small water systems, serving fewer than 100 people.<ul style="list-style-type: none">○ Lack financial, technical, managerial capacity.Lesson=consolidation/capacity development.◆ ODW approach to compliance consistent with EPA's NPDWR and enforcement response policy.◆ Focus on protecting public health, educate and inform, allow fair opportunity to achieve compliance. Support WS, hold WS and operators accountable for compliance.◆ ODW uses "soft" and "hard" tools.



	<ul style="list-style-type: none">○ Soft: Education, technical assistance, help with grants, assistance developing technical, managerial, and financial capacity; consolidation, violation letters, final warning that formal enforcement is coming.○ Hard: Red operating permit; notice of correction/order to correct; issue civil penalties, suspend or revoke operator certification, chronic violations—order WS to study itself for consolidation.◆ Less typical hard tools: emergency orders—when violation endangers public health, pose a significant threat, or cause serious harm to public interest; or knowing/willful violation.◆ System violates substantially similar requirements, owner/operator has other systems with previous similar violations; previous notifications; violation committed by business that employs 50+ employees on at least one day in preceding 12 months.◆ EPA oversight: ODW has delegated authority to act.<ul style="list-style-type: none">○ ODW reports violations of NPDWR.○ EPA tracks ODW efforts.○ EPA uses enforcement tracking tool (ETT). Score of 11=priority system.◆ ODW has 6 months to RTC priority/violating systems; put system under enforcement document. WA Administrative procedures act: certified mail to ensure delivery.◆ EPA can “over file” and pursue direct federal enforcement. State can request EPA over file.◆ ODW updated statewide compliance assurance to respond to EPA’s ongoing action. Better aligns ODW process. Simplifies confusing wording. Allows EPA to react much faster.◆ Added language to violation letters.<ul style="list-style-type: none">○ Notice of Violation is now Notice to Correct Violation.○ Notice of Correction is now Order to Correct Violation.
8. Agenda Ideas for next Meeting Brian Walsh	<ul style="list-style-type: none">◆ Updates on Manganese, Lead and Copper, other topics from today.◆