

EPA REQUESTS RESPONSE ON LEAD & COPPER RULE ADMINISTRATION

Recent events in Detroit and other cities have raised questions about lead and the safety of the nation's drinking water. In response, EPA is increasing its oversight of state programs in their implementation of the Lead and Copper Rule.

To do this, EPA Regions have been working with each of their state drinking water programs to respond to a list of questions concerning state operations that Deputy Assistant Administrator Joel Beauvais has written to state Environmental or Health Department Directors, and EPA Administrator, Gina McCarthy has written to state governors expressing the need for inter-governmental cooperation, reporting on current status of administrative requirements, and suggesting the institution of additional actions and activities.

In his letter to Director Virginia Pressler, Mr. Beauvais declares; "There is no higher priority for the U.S. Environmental Protection Agency than protecting public health and ensuring the safety of our nation's drinking water." In his letter, Mr. Beauvais asked the state to take the lead in implementing several "near-term actions" to strengthen public health protection. These actions include:

- ◆ Confirm that the state's protocols and procedures for implementing the LCR are fully consistent with the LCR and applicable EPA guidelines.

- ◆ Use relevant EPA guidance on LCR sampling protocols and procedures for optimizing corrosion control.
- ◆ Post on the agency's public website all state LCR sampling protocols and guidance for identification of Tier 1 sites (at which LCR sampling is required to be conducted).
- ◆ Work with public water systems, with a priority emphasis on large systems to increase transparency in implementation of the LCR by posting on their public website and/or on the agency's website:
 - a. the materials inventory that systems were required to complete under the LCR, including the locations of lead service lines, together with any more updated inventory or map of lead service lines and lead plumbing in the system; and
 - b. LCR compliance sampling results collected by the system, as well as justification for invalidation of LCR samples; and
- ◆ Enhance efforts to ensure that residents promptly receive lead sampling results from their homes together with clear information on lead risks and how to abate them, and that the general public receives prompt information on high lead levels in drinking water systems.

While several of the suggested actions are either already taking place or may not be

SEE LEAD & COPPER RULE, PAGE 2

VOLUME 20, ISSUE 2

APRIL 2016

In this issue:

Reminders	2	RTCR	5
Quarterly Calendar	3	Operator Certification	7
Conferences	4	SDWB News	8

LEAD & COPPER RULE

CONTINUED FROM PAGE 1

applicable to Hawaii water systems, the Safe Drinking Water Branch will be posting LCR sampling protocols on our website, confirming some information about the materials surveys and assuring that we understand water system procedures for

notifying residents participating in lead and copper sampling of their results.

Finally, the EPA intends to make regulatory revisions to correct shortcomings in the LCR. They expect these to be ready in 2017, so hold on to your hats! For more information, please contact Alain Carey at 808-586-4258.

BEWARE! MONITORING PERIODS ENDING DECEMBER 2016

Phase II/V Synthetic Organic/Inorganic Chemical Rule (Phase II/V SOC/IOC)

The 2014-2016 Monitoring period for the Phase II/V SOC/IOC Rule comes to a close on December 31, 2016. For those water systems who have not yet submitted their compliance monitoring for this rule, you have only nine short months to complete this monitoring. Samples must be taken from each entry point to the distribution system. Please consult Sample Collection and Reservation System (SCRS) and make your reservations now for analyses that can be done by the State Laboratories Division (SLD) to avoid the possibility that the SLD lab will be fully booked by the time you want to or need to sample. It is also a good idea to allow time for those analyses which must be done through certified mainland labs to do the analyses and report results.

Please contact Zhaohui Wang at 808-586-4258 if you have any questions on Phase II/V.

Revised Radionuclide Rule (RRR)

Maybe it's been so long that you've forgotten (despite reminders in The Water Spot). If you haven't done your Revised Radionuclide Rule monitoring for the period January 1, 2008 to December 31, 2016, you are not alone. SDWB records show that many of you (mostly small private systems) have not yet satisfied your routine monitoring requirement for radionuclides monitoring. Most of you have had NINE YEARS to get this done, and have waited to the last minute to do it.

Remember, the testing for gross alpha, gross beta, radium 226, radium 228, and uranium must be done from each entry point to the distribution system by community water systems.

All results for both Phase II/V and RRR must be received by the SDWB by January 10, 2017 (ten days after the monitoring period). Please make sure that your certified laboratory can get you the report by that time, so don't wait until December 31, 2016 to do the sampling. There will be no acceptable excuse for being late, and violations will be issued.

Please contact Mel Hamano at 808-586-4258 if you have any questions on RRR.

QUARTERLY CALENDAR

- ◆ **4/5-8 DSO Exam Prep**
Oahu
- ◆ **4/8 CT Report Due**
Surface Water Systems
- ◆ **4/8 MRDL Report Due**
Disinfection Systems who complete their own tests
- ◆ **4/8 TCR Report Due**
Systems who complete their own tests
- ◆ **4/8 Enhanced Coagulation Report Due**
Conventional Treatment Systems
- ◆ **4/8 Chemical Quarterly Monitoring Report Due**
Systems with quarterly monitoring requirements
- ◆ **4/11-14 DSO Exam Prep**
Waikoloa
- ◆ **4/25-29 DSO Exam**
Maui, Kona, Oahu, Hilo, Kauai, Lanai, & Molokai
- ◆ **4/26 WTPO Applications Due**
July Examinees
- ◆ **5/10 CT Report Due**
Surface Water Systems
- ◆ **5/10 TCR Report Due**
Systems who complete their own tests
- ◆ **5/24 Board of Certification Meeting**
SDWB Honolulu, 10:00 am
- ◆ **5/26 WTPO Exam Registrations Due**
July Examinees
- ◆ **6/9 CT Report Due**
Surface Water Systems
- ◆ **6/9 TCR Report Due**
Systems who complete their own tests
- ◆ **7/1 CCR Distribution Deadline**
Community Systems

APRIL 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
					1	2
3	4	5 Oahu DSO Exam Prep	6 Oahu DSO Exam Prep	7 Oahu DSO Exam Prep	8 Oahu DSO Exam Prep CT Report Due MRDL Report Due TCR Report Due Enhanced Coagulation Report Due Chemical Quarterly Monitoring Report Due	9
10	11 Waikoloa DSO Exam Prep	12 Waikoloa DSO Exam Prep	13 Waikoloa DSO Exam Prep	14 Waikoloa DSO Exam Prep	15	16
17	18	19	20	21	22	23
24	25 Maui & Kona DSO Exam	26 Oahu & Hilo DSO Exam WTPO Applications Due	27 Kauai DSO Exam	28 Lanai DSO Exam	29 Molokai DSO Exam	30

MAY 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10 CT Report Due TCR Report Due	11	12	13	14
15	16	17	18	19	20	21
22	23	24 Board of Certification Meeting	25	26 WTPO Exam Regis- trations Due	27	28
29	30 HOLIDAY	31				

JUNE 2016

Sun	Mon	Tue	Wed	Thu	Fri	Sat
			1	2	3	4
5	6	7	8	9 CT Report Due TCR Report Due	10 HOLIDAY	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	1 CCR Distribution Deadline	

2016 PACIFIC WATER CONFERENCE

For the third year consecutive year, the American Water Works Association Hawaii Section (AWWA HI) and the Hawaii Water Environment Association (HWEA) joined forces to present the Pacific Water Conference at the Hawaii Convention Center on February 2-4. The theme for 2016 was “Eho’olokahi pu e malama aku ai i ko kakou wai” or “Working Together to Protect Our Water Resources.”



Ann Zane, Michael Dau of Kipapa Acres Water System, Alain Carey & Joan Corrigan

The SDWB supported small water systems again this year by sponsoring the registration of 66 eligible system personnel and



Pipe Tapping Winner HBWS: Ben Meria, Christopher Morris, Evan Kaneshiro & Chad Kamalani-Coleman

operators. Thank you for your participation in this year’s conference.

Attendees of the pre-conference held on February 2 could choose workshops from five different tracks. The conference pro-

gram consisted of 78 technical sessions covering drinking water, wastewater and stormwater topics. Additional networking breaks were added for participants to connect as well as visit the exhibit booths. Operator’s challenges were held, testing the skills of our operators in Pipe Tapping and Top Ops.

This year, the Honolulu Board of Water Supply (HBWS) won the pipe tapping



Top Ops Competitors from Molokai, HBWS, Kawela and Maui

contest with a time of 1:43:94 minutes and will represent Hawaii at the next national AWWA conference. At the Top



HRWA’s Greg DeVito, Mahana Gomes, Frank Pouliot & Malia Lightner

Ops Challenge, the competition was fierce with Team Kawela taking the championship.

Thank you AWWA HI for an enlightening conference!

RTCR - ASSESSMENTS & CORRECTIVE ACTIONS

The Revised Total Coliform Rule (RTCR) is effective April 1, 2016 and applies to all public water systems. Water systems will continue to collect the same number of routine samples as they collect now, and collect repeat samples within 24 hours of being notified of a coliform positive sample.

New Routine and Repeat Monitoring Requirements

- ◆ All systems are required to collect three repeat samples following a total coliform positive sample (small systems previously had to collect four repeat samples).
- ◆ Systems return to their monthly monitoring schedule the month following a total coliform positive sample INSTEAD OF collecting a minimum of five routine samples that month.

Assessments

When a water system exceeds a treatment technique trigger, it must conduct an assessment to find and fix “sanitary defects”. A Level 1 assessment is a basic examination of monitoring practices, source water, treatment, distribution system, and relevant operational practices, and is conducted by water system staff.

A Level 1 assessment is triggered by the following situations:

- ◆ For a system collecting fewer than 40 samples per month, two or more samples are total coliform positive (routine and repeat), or
- ◆ For a system collecting 40 or more samples per month, more than 5.0% are total coliform positive, or
- ◆ A system fails to take three repeat samples after a total coliform positive routine sample.

The Level 2 assessment is a more detailed water system evaluation, and a state-approved party (such as qualified personnel within the water system or technical assistance providers) or the state must perform the assessment. *The SDWB has been reviewing and approving applications for Level 2 assessors.*

A Level 2 assessment is triggered by the following scenarios:

- ◆ An *E. coli* MCL violation, or
- ◆ A second Level 1 assessment being triggered within a rolling 12-month period, unless the state concurs with the likely cause for the first Level 1 trigger, and establishes that the system has fully corrected the problem.

You must complete the Level 1 or Level 2 assessment within 30 days of learning the assessment has been triggered.

Sanitary Defects and Corrective Actions

The RTCR distinguishes between “sanitary defects” and “defects in coliform monitoring practices”, and either can result in positive coliform samples. The assessment identifies corrective actions to fix sanitary defects, and makes recommendations for responding to monitoring practice defects.

RTCR - ASSESSMENTS & CORRECTIVE ACTIONS

CONTINUED FROM PAGE 5

A *sanitary defect* is a pathway for microbial contamination into the water system, or a failure or imminent failure of an existing barrier. An example of a sanitary defect is a failure of the chlorination equipment. The corrective action would discuss when it was brought back into service and other follow-up actions.

An example of a *defect in coliform monitoring practices* could be using a dirty cooler to transport wastewater samples *and* drinking water samples. The RTCR doesn't require correction of monitoring practice defects, but such uncorrected defects could trigger future assessments.

After you identify a sanitary defect, it should be corrected as soon as possible. You must complete corrective actions no later than the time the assessment form is submitted to the SDWB, or propose a timeframe for correcting the sanitary defect. The proposed timeframe must be approved by the SDWB. It is also possible that you cannot determine the cause of the coliform positive sample and no sanitary defects are identified.

You can find Level 1 and Level 2 assessment forms on the SDWB website at: <http://health.hawaii.gov/sdwb/revise-total-coliform-rule/>

Violations

A water system will receive an *E. coli* MCL violation under any of the four following scenarios:

Routine Sample	Repeat Sample
E. coli positive	→ Total coliform positive
E. coli positive	→ Any missing repeat sample
Total coliform positive	→ E. coli positive
Total coliform positive	→ Total coliform positive (but no E. coli analysis)

NEW!
NEW!

Failure to conduct an assessment within 30 days of a trigger, or to correct a sanitary defect within the specified timeframe will result in a treatment technique violation.

How Can Utilities Prepare?

Take all coliform positive samples seriously! Each one could lead to a violation, assessment, or Boil Water Notice.

Collect all routine and repeat samples in a timely manner. Update your sample site plan to eliminate poor sample points and ensure that the entire service area is covered. Improve communication between the micro lab and system operators (treatment and distribution) so that operators are informed of coliform positives as quickly as possible. Identify and qualify staff who will be performing Level 1 and Level 2 assessments. Practice conducting Level 1 and Level 2 assessments.

Please email Ann Zane at ann.zane@doh.hawaii.gov, or call the Compliance section at (808) 586-4258 if you have any questions.

WTPO PASS RATE JUMPS UP

The pass rate for the Water Treatment Plant Operator (WTPO) exam has not exceeded 60% in the past three years. This January's WTPO exam's pass rate reached 61%. The table to the right provides a breakdown by grade. Congratulations to those who passed the exam!

Grade	Passed	Examinees	Passing Rate
1	3	5	60%
2	6	9	67%
3	1	1	100%
4	1	3	33%
Total	11	18	61%

Prior to the exam, Hawaii Rural Water Association (HRWA) provided a WTPO Exam Preparation class on the Big Island where a majority of the examinees were located. Attendees of the training did well, however, the Laboratory Analyses section of the exam was an area that most examinees only partially mastered according to the overall mastery summary report.

For those who would like to retake the exam in July, please submit your exam registration form and fee by April 26, 2016.

2016 RENEWAL REMINDER

Renewal forms for all Distribution System Operator (DSO) and Water Treatment Plant Operator (WTPO) certifications expiring on November 30, 2016 were recently mailed. Included on the renewal form was a listing of all Continuing Education Units (CEUs) recorded within your current certification period. If you have taken other courses that are not listed, please submit the proof of attendance and agenda for review and approval by the

Board of Certification of Public Water System Operators. If you have sufficient CEUs to renew, please submit your renewal form and fee before the renewal due date of November 16, 2016. Only cashier's checks or money orders will be accepted. No personal checks, please.

If you have any questions with your renewal or CEUs recorded, please contact Jodi Yamami at 808-586-4263.

HRWA CEU Training Program for Water System Operators



Contact hrwaoffice@hawaiiirwa.org
or 808-315-8925 for course listing.

Operator Library Reference Books for ABC Exams Available

Contact Jodi Yamami
jodi.yamami@doh.hawaii.gov



**HAWAII STATE
DEPARTMENT OF HEALTH
SAFE DRINKING WATER
BRANCH**

919 Ala Moana Blvd.
Room 308
Honolulu, HI
96814-4920

Tel: 808 586-4258
Fax: 808 586-4351

E-mail: SDWB@doh.hawaii.gov



DAVID Y. IGE
Governor of Hawaii

VIRGINIA PRESSLER, M.D.
Director of Health

KEITH E. KAWAOKA, D. Env.
Deputy Director for Environmental Health

The mission of the Safe Drinking Water Branch of the Department of Health is to safeguard public health by protecting Hawaii's drinking water sources (surface water and groundwater) from contamination and assure that owners and operators of public water systems provide safe drinking water to the community. This mission is accomplished through the administration of the Safe Drinking Water Program, Underground Injection Control Program (UIC), Groundwater Protection Program (GWPP), and the Drinking Water State Revolving Fund (DWSRF).

We're on the Web!

<http://health.hawaii.gov/sdwb/>

We provide access to our activities without regard to race, color, national origin (including language), age, sex, religion, or disability. Write or call our Affirmative Action Officer at Box 3378, Honolulu, HI 96801-3378 or at 808 586-4616 (voice) within 180 days of a problem.

ALAIN TRANSFERS TO LEAD & COPPER

Alain Carey switched positions on March 1, 2016 from the Drinking Water State Revolving Fund (DWSRF) Engineer to the Lead and Copper/Capacity Development Engineer. In his new position, Alain will provide rule implementation and technical subject matter expertise for the lead and copper rule under the Federal Safe Drinking Water Act. He will also administer programs to promote improvements in technical, managerial, and financial capacity of public water systems.



Alain Carey

For all assistance with the lead and copper rule and capacity development issues, you may now contact Alain at 808-586-4258.