

LEAD SERVICE LINE INVENTORY QUESTIONS & ANSWERS

As we begin a New Year, here's a reminder to look ahead to the Lead Service Line Inventory (LSLI) and Replacement Plan requirements of the new Lead and Copper Rule Revisions (LCRR). These two items could take considerable time and effort, so we suggest starting as early as possible. There are Bipartisan Infrastructure Law (BIL) funds available from the Drinking Water State Revolving Fund (DWSRF) for projects related to these requirements. Eligible costs include:

- ◆ Lead Service Line (LSL) identification
- ◆ planning, design, and construction for LSL replacement projects
- ◆ non-compliance lead sampling and
- ◆ temporary pitcher filters and POU devices

The following FAQs are provided to clarify LSLI and LSL replacement requirements that must be met by **October 16, 2024**.

Who needs to meet these requirements?

- ◆ All community and non-transient, non-community water systems must meet these requirements. Transient, non-community water systems do not. If you are unsure which category your water system falls into, contact the SDWB at 808-586-4258.

Exactly what are the requirements?

- ◆ All water systems must prepare a lead service line inventory (LSLI) to identify the materials of service lines connected to the water system's distribution system, in accordance with 40 CFR 141.84(a).
- ◆ The LSLI must be publicly accessible and must be updated annually. Water systems serving greater than 50,000 persons (PWSs 212, 331, 335, 360 and 367) must make the publicly accessible inventory available online.
- ◆ LSLIs must be reported to the SDWB by **October 16, 2024**, in accordance with 40 CFR 141.90(e).

Is there LSLI guidance for me to follow?

- ◆ EPA guidance on how to meet the LSLI requirement may be found here: [Guidance for Developing and Maintaining a Service Line Inventory \(epa.gov\)](#)
- ◆ Templates may be found here: [Inventory Template FINAL 0.xlsx \(live.com\)](#)

What does "publicly accessible" mean?

- ◆ The inventory must include a location identifier, such as a street address, block, intersection, or landmark, associated with each lead service line and galvanized requiring replace-

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LSLI Q & A

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ment service line. Water systems may, but are not required to, include a locational identifier for lead status unknown service lines or list the exact address of each service line.

- ◆ See Chapter 7 Public Accessibility of the above LSLI guidance.

Can I tell by the age of my water system?

- ◆ Plumbing before 1930 is most likely to contain lead. Between 1920 and 1950, galvanized pipes were used for plumbing. After 1930, copper generally replaced lead. Up until the late 1980s, lead solders were typically used to join copper pipes. The lead-free requirements of the 1986 Safe Drinking Water Act banned lead solder with more than 0.2% lead and plumbing with more than 8% lead. Buildings did not have to be built with certified "lead-free" fixtures until 1997. (*AWWA*)

Does the SDWB have circuit rider resources to assist me with performing my LSLI?

- ◆ Yes. Contact the SDWB if you need such resources.

Can the SDWB review my LSLI inventory before the deadline?

- ◆ Time and resources permitting, the SDWB is always available to provide guidance and clarification on the LSLI requirements and draft documents prior to the **October 16, 2024**, deadline.

What if I find lead service lines? What do I do then?

- ◆ All water systems with one or more lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must, by **October 16, 2024**, prepare a [lead service line replacement plan](#) in accordance with 40 CFR 141.84(b).
- ◆ LSL replacement plans must be reported to the SDWB by **October 16, 2024**, in accordance with 40 CFR 141.90(e).
- ◆ Follow your SDWB-approved lead service line replacement plan with guidance from the SDWB.

I heard that most LSLs are 2-inches in diameter or less. Correct?

- ◆ LSLs are rarely found in sizes greater than 2" in diameter. Buildings with larger service lines, such as schools, large apartments, or commercial buildings, are less likely to have them. Smaller buildings, which tend to have smaller service lines, may have LSLs. Explicit attention should be given to child-care and schools in developing LSL replacement initiatives, since homebased childcare facilities or small school annexes may be housed in these smaller buildings with LSLs. (*LSLR Collaborative*)
- ◆ Anecdotally, States with well-developed LSLIs have also rarely reported seeing LSLs above 2-inches in diameter.

What kinds of filters can I use if I suspect an LSL or if only a partial LSL replacement is possible?

- ◆ Occupants should consider using filters meeting ANSI/NSF 53 certification (https://info.nsf.org/Certified/dwtu/listings_leadreduction.asp) for lead removal after a partial LSL replacement.

LSLI Q&A

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- ◆ “NSF certified water filters for lead reduction have been evaluated in a study using water that contains 150 parts per billion (ppb) of lead. This lead concentration is ten times higher than the U.S. EPA maximum allowable level in drinking water. The filters are challenged at this level of contaminated water for beyond the filter’s claimed service life-cycle. Certification is only confirmed when the product has met all of the lead reduction and other requirements of the standard. NSF also audits the facilities in which the products are manufactured annually to ensure the product being manufactured meets the standard.” (*LSLR Collaborative*)

Can I use home test kits for lead that I bought from a hardware store or big box store?

- ◆ Only qualified laboratory testing can reliably confirm the amount of lead in drinking water. Home test kits may not provide an accurate measurement of water quality. (*NSF.org*) Contact the SDWB at 808-586-4258 for a list of certified labs or visit our website at <https://health.hawaii.gov/sdwb/files/2023/02/Drinking-Water-Certified-Labs-20230130.pdf>.

What if I know that I have no lead service lines?

- ◆ When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines (regardless of ownership) in its inventory, it may comply with the publicly accessible requirements using a written statement, in lieu of the inventory, declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines.
- ◆ When the water system has demonstrated that it has no lead, galvanized requiring replacement, or lead status unknown service lines in its inventory, it is no longer required to submit inventory updates to the State, except in the case that a water system subsequently discovers any service lines requiring replacement in its distribution system, it must notify the SDWB within 30 days of identifying the service line(s) and prepare an updated LSLI on a schedule established by the SDWB.

What are the penalties for missing the 2024 deadline?

- ◆ Per EPA Region 9: “It is unclear at this time if the inventory requirement will be a treatment technique (TT) requirement versus a reporting (M/R) requirement...” This means missing the October 16, 2024, deadline will be a violation. However, the type of violation has not yet been determined, i.e., TT or M/R. The Lead and Copper Rule Improvements (LCRI) Rule is expected to address and possibly revise many of the current LCRR requirements.

What is the most important thing to remember about these LSLI and LSL Replacement Plan requirements?

- ◆ START EARLY!!!!!!

LINKS FOR THE CFR REFERENCES:

- ◆ <https://www.law.cornell.edu/cfr/text/40/141.84>
- ◆ <https://www.law.cornell.edu/cfr/text/40/141.90>

Other Useful Resources:

- ◆ <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>
- ◆ <https://www.lslr-collaborative.org/preparing-an-inventory.html>

CONFERENCE

2023 PACIFIC WATER CONFERENCE
FEBRUARY 7-9, 2023
HAWAII CONVENTION CENTER



Operator networking



SDWB thanks Mike.



Leila enjoys the presentations.



Co-workers - old and new



Anna and Barry of EPA meet up with friends.



The SDWB gang always enjoys a good lunch.



Maureen, Penny, & Maleeyah are ready to learn.



Wang and Anna present on PFAS Regulations.

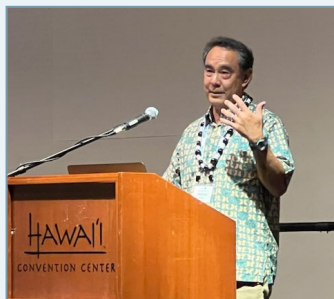


Whitney, Melvin, and Ann talk work.

If you missed Mike's heartfelt presentation, check it out here.



Dennis and Bob attend a session.



An Inspector's Journey by Mike



Louisa and Joy catch up.

May 23-25, 2023

**Courtyard
King Kamehameha's
Kona Beach Hotel**

Kailua-Kona, Hawaii



**HAWAI'I RURAL WATER ASSOCIATION
TRAINING AND TECHNICAL
CONFERENCE**

To register, click

<https://www.hrwa.net/hrwa-conference.html>

CYBERSECURITY IN SANITARY SURVEYS

In a recent memo to all States from Radhika Fox, Assistant Administrator of the Office of Water, US EPA, the strengthening of cybersecurity has become a top focus to progress toward a more cyber-resilient water sector. Fox stated, “In the US, over 100,000 public water systems provide safe drinking water to more than 300 million people. These systems operate 24 hours a day, 7 days a week to deliver clean, safe, and reliable water that is essential to our daily lives. Unfortunately, cyber-attacks targeting water systems pose a real and significant threat to our security. Incidents of malicious cyber-attacks on water systems have shut down critical treatment processes, locked control system networks behind ransomware, and disabled communications used to monitor and control distribution system infrastructure like pumping stations. This threat is not hypothetical. Water systems across the country have reported these attacks with increasing frequency.”

To address the concern, Fox outlined three options that States have to evaluate

public water system cybersecurity:

- 1) Self-assessment or third-party assessment of cybersecurity practices prior to the sanitary survey
- 2) State evaluation of cybersecurity practices during the sanitary survey
- 3) Alternative State program for water system cybersecurity as stringent as the sanitary survey program

The SDWB will be discussing with EPA the implementation timeline of addressing PWS cybersecurity in sanitary surveys and will keep PWSs abreast of developments. Until then, EPA provides technical resources at <https://www.epa.gov/waterriskassessment/epa-cybersecurity-water-sector>. Remote technical assistance service from EPA may be accessed at <https://www.epa.gov/waterriskassessment/forms/epas-water-sector-cybersecurity-evaluation-program>. And a free cybersecurity assessment may be requested from Horsley Witten Group at <https://www.epa.gov/system/files/documents/2021-07/technicalassistanceflyerupdate-hwg.pdf>.

BACK TO PAPER-BASED DSO & WTPO EXAMS

In order to ensure continuous certification examination administration for DSO and WTPO applicants: **Only paper-based examinations will be administered starting January 2023.** These proctored in-person paper-based examinations will be scheduled for at least the next six months, after which a determination will be made in switching back to computer-based examinations on Oahu and Maui only. Examinees on the Big Island, Kauai, Molokai, and Lanai will remain on paper-based examination administration throughout.

Please notify Jodi Yamami of the Compliance Section at jodi.yamami@doh.hawaii.gov if there are any concerns about DSO and WTPO certification examinations. Thank you for your understanding in this matter as the SDWB sorts out the related issues to ensure continuity of the operator certification program.

DSO Exam Review Class by HRWA

April 10-14 ♦ Molokai ♦ Grades 1-4

April 18-21 ♦ Maui ♦ Grades 3-4

April 18-21 ♦ Virtual ♦ Grades 3-4

Contact HRWA at hrwaoffice@hawaiiirwa.org or 808-315-8925 for details and registration information.

RENEWALS

Thank you to all the certified operators who renewed their DSO and/or WTPO certifications on time. All regulated public water systems in Hawaii requiring certified operators are in compliance and have at least one certified operator in responsible charge.

Thank you for your efforts in continuing to provide safe drinking water to the community. The SDWB appreciates you!

MAY 23, 2023
10:00 A.M.

Board of Certification of
Public Water System Operators
Meeting

BOARD MEMBERS

Glenn Ah Yat - James Landgraf
Mark Prescott - Jodi Yamami

Contact
jodi.yamami@doh.hawaii.gov
for location information

HRWA CEUs for Water System Operators

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

Course	Date	Location
Electrical Components 0.4 CEUs (4 contact hours)	4/18/23 or 4/20/23	Live-Virtual

QUARTERLY CALENDAR

- ◆ **4/10 CT Report Due**
Surface Water Systems
- ◆ **4/10 MRDL Report Due**
Disinfection Systems who complete their own tests
- ◆ **4/10 RTCR Report Due**
Systems whose samples are analyzed outside of the State lab
- ◆ **4/10 Chemical Quarterly Monitoring Report Due**
Systems with quarterly monitoring requirements
- ◆ **4/10-14 DSO Exam Review**
Molokai
- ◆ **4/18-21 DSO 3-4 Exam Review**
Maui, Virtual
- ◆ **4/20 Molokai Exam**
- ◆ **4/24 Kona Exam**
- ◆ **4/25 Oahu Exam**
- ◆ **4/25 DSO & WTPO Applications Due**
July Examinees
- ◆ **4/25 DSO & WTPO Exam Registrations Due**
July Examinees
- ◆ **4/26 Hilo Exam**
- ◆ **4/27 Maui Exam**
- ◆ **5/10 CT Report Due**
Surface Water Systems
- ◆ **5/10 RTCR Report Due**
Systems whose samples are analyzed outside of the State lab
- ◆ **5/23 Board of Certification Meeting**
10:00 am, Pearl City Office
- ◆ **5/23-25 HRWA Training & Technical Conference**
Kona
- ◆ **6/9 CT Report Due**
Surface Water Systems
- ◆ **6/9 RTCR Report Due**
Systems whose samples are analyzed outside of the State lab

APRIL 2023

Sun	Mon	Tue	Wed	Thu	Fri	Sat
2	3	4	5	6	7	8
HOLIDAY						
9	10	11	12	13	14	15
	CT Report Due MRDL Report Due RTCR Report Due Chemical Quarterly Monitoring Report Due DSO Exam Review	DSO Exam Review	DSO Exam Review	DSO Exam Review	DSO Exam Review	
16	17	18	19	20	21	22
		DSO 3-4 Exam Review	DSO 3-4 Exam Review	Molokai Exam DSO 3-4 Exam Review	DSO 3-4 Exam Review	
23	24	25	26	27	28	29
	Kona Exam	Oahu Exam DSO & WTPO Applications Due DSO & WTPO Exam Registrations Due	Hilo Exam	Maui Exam		

MAY 2023

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

JUNE 2023

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

The 2023-2025 compliance period has started.
 State Laboratory renovation & helium shortages may affect the State Laboratory availability for analyses.
Please plan sample collections accordingly.

WATER SECTOR JOB POSTINGS

- ◆ **Hawaii Water Service**
 Waikoloa
 Utility Worker(s)
 1 certification (DSO or WTPO) preferred but not required
 Apply at <https://calwatergroup.wd5.myworkdayjobs.com/CWSG>
- ◆ **RCAC**
 Hawaii
 Small Utility Consultant I
 Job description at <https://www.rcac.org/careers/>
 Contact: Joni Johnson at (808) 854-3989

PROPOSED PFAS REGULATION

On March 14, 2023, EPA announced the proposed regulation for per- and polyfluoroalkyl substances (PFAS) in the nation's drinking water which will establish legally enforceable maximum contaminant levels (MCLs) for six PFAS as shown in the table. Health-based maximum contaminant level goals (MCLGs) have also been proposed for these six PFAS.

Compound	Proposed MCLG	Proposed MCL (enforceable levels)
PFOA	Zero	4.0 ppt (also expressed as ng/L)
PFOS	Zero	4.0 ppt (also expressed as ng/L)
PFNA	1.0 (unitless)	1.0 (unitless)
PFHxS		
PFBS		
HFPO-DA (commonly referred to as GenX Chemicals)	Hazard Index	Hazard Index

PFAS National Primary Drinking Water Regulation Rulemaking (Pre-publication), 40 CFR Parts 141 and 142, Docket No. EPA-HQ-OW-2022-0114, (March 13, 2023) Click [here](#) for link.

We encourage every purveyor to visit the EPA PFAS website at <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas> for details as EPA's proposal will impact most of the public water systems in Hawaii. Subsequent to the publishing of the proposed rule, we also encourage submitting public comments during the public comment period.

MEGAN BIRDSALL, GENERAL PROFESSIONAL



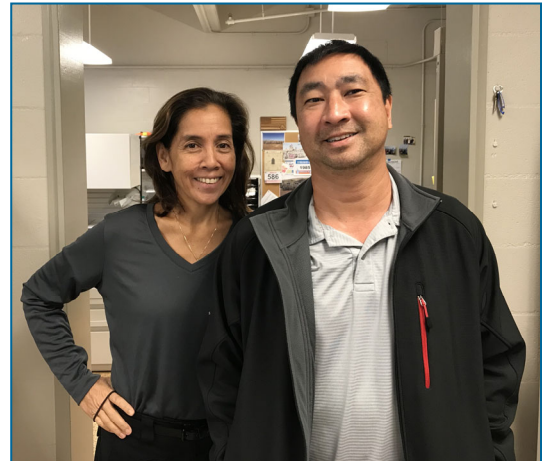
On December 27, 2022 Megan Birdsall was promoted to General Professional III within the SDWB. In her new position, Megan supports the administrative processes revolving around the budget and EPA workplans. She will also be involved with contract management including contracts for applicants seeking SDWB grant funding. You may reach Megan for all your contract inquiries at megan.birdsall@doh.hawaii.gov.

Congratulations, Megan!

ANN, SCOTT, & SHANNON JOIN THE SDWB

The SDWB welcomes our two new Environmental Health Specialists, Ann Kam and Scott Murakawa to the Monitoring Section and our new Office Assistant, Shannon Woodward.

After spending almost her entire career on Kauai at the Department of Agriculture, Ann decided to hop over to Oahu to the SDWB. With her dynamic personality, it is evident she will not stop until the job is done. The SDWB is fortunate her family is sharing her time with us. If you have any questions of Ann, you may contact her at ann.kam@doh.hawaii.gov.



Scott joins us from the top of Waimano Ridge where he spent twenty years combined in the Clean Water Branch, Clean Air Branch, and Solid & Hazardous Waste Branch. With his extensive environmental background and valuable expertise, he will be able to tackle any project thrown at him. When he's not on the job, Scott enjoys all sports whether it be playing, coaching, or watching. You may contact him at scott.murakawa@doh.hawaii.gov for your monitoring needs or any sports info!



Shannon recently switched over to the State from the private sector and is looking forward to this new opportunity. She will work primarily on Operator Certification administration and will be one of the cheerful voices you hear if you call the SDWB. She is a single mother of 4 that loves the outdoors who can manage a busy lifestyle which is a benefit for her position. Shannon may be reached at shannon.woodward@doh.hawaii.gov.

Welcome, Ann, Scott, and Shannon! It's great to have you on board!

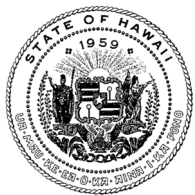


**HAWAII STATE
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SAFE DRINKING WATER
BRANCH**

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JOSH GREEN, M.D.
Governor of Hawaii

KENNETH S. FINK, M.D.
Director of Health

KATHLEEN S. HO
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!

<https://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.

FAREWELL THERESA



The SDWB bid a fond farewell to Theresa McGeehan-Takiue, Environmental Health Specialist in the SDWB Monitoring Section. After 19 years of service in the SDWB, Theresa retired at the end of 2022. She was the only neighbor-island member of the SDWB and held down the fort from Hilo, Hawaii. Theresa will most definitely be difficult to replace.

Although she looks forward to retirement, Theresa will sincerely miss serving the drinking water industry. Melvin Tokuda, Monitoring Section Supervisor, stated, "Theresa selflessly served the State of Hawaii, the Big Island County, and the Department of Health. Through her commitment to her job, Theresa ensured that her community was always provided with safe drinking water. Theresa never shied away from any challenge she faced during her professional career and could be counted on when the need arose. We will truly miss her and wish her the best in her future endeavors."

Theresa is grateful for reaching this phase in her life and considers it a blessing. She realizes there is still much more to do and is looking forward to living life to the fullest. Thank you, Theresa for all your contributions to the SDWB. We wish you the best in retirement! Mahalo and a hui ho!