

Changes to Consecutive Monitoring Agreements



Today's Agenda

- Introduction
- What is Changing and Why
- Roll-out Plans
- Revised Total Coliform Rule and Site Selection Review
- Next Steps
- Questions/Discussion



What is Changing and Why

Background

- 1992 – EPA approves LCR consecutive agreement
- 2004 – EPA approves TCR consecutive agreement
- Spring 2017 – Region 5 notifies DEQ of intent to review
- Fall 2017 – Region 5 notifies DEQ of decision to rescind
- 2018 – DEQ works with EPA and GLWA to plan transition
- Now through 2019 – Transition to standard monitoring

Background (cont.)

40 CFR §141.29, "Monitoring of consecutive public water systems", provides that:

When a public water system supplies water to one or more other public water systems, the State may modify the monitoring requirements imposed by this part to the extent that the interconnection of the systems justifies treating them as a single system for monitoring purposes. Any modified monitoring shall be conducted pursuant to a schedule specified by the State and concurred in by the Administrator of the U.S. Environmental Protection Agency.

EPA Review

- Region 5 EPA re-evaluated intent of 40 CFR §141.29
- Likely adapted from provision of the 1962 Public Health Standards entitled "Chemical Characteristics."
- EPA feels the intent was geared toward source based contaminants, where levels would not be anticipated to increase from the source to the tap (ex VOCs)
- EPA no longer believes it is appropriate to use 40 CFR §141.29 to reduce monitoring for contaminants whose concentration may be expected to vary once the water enters the distribution system

EPA Review - LCR

Additionally, the final LCR preamble discourages the use of 40 CFR §141.29 for lead and copper monitoring:

EPA does not believe that modification by States of the monitoring requirements of this rule, as provided in 40 CFR §141.29, would be appropriate because the primary source of high lead or copper levels at the tap is materials within the distribution system itself (Emphasis added.)

EPA Review - RTCR

- April 2016 RTCR has "find and fix" approach and more stringent requirements for remaining on/qualifying for reduced monitoring.
- Total coliform (TC) monitoring designed to be an indicator of distribution system integrity. Events such as sudden decreases in water pressure, low pressure incidents, and main breaks can create a pathway for pathogens to enter the system.
- TC can be detected in the distribution system, even if finished water free from microbial contamination was provided by the treatment plant.
- When different entities maintain individual distribution systems, different qualities of maintenance exist and should not be treated as a single system for TC monitoring.
- Consecutives, as well as wholesalers, should take the required number and frequency of samples, as laid out in the RTCR.



Roll-out Plans

Transition to Standard Monitoring

- Transition will require time and resources to accomplish
- Implementation will be phased in based on:
 - Degree of impact on the water supply
 - Coordination with other regulatory efforts
 - Time needed to expand services to accommodate increased sampling.

Total Coliform

	# CWS	Updated SSP Due to DEQ	DEQ SSP Review By	Begin Monitoring Per New SSP
Already collecting enough samples	22	9/30/2018	12/31/2018	already meeting
Must increase by fewer than 10 samples	27	12/31/2018	3/31/2019	4/1/2019
Must increase by 11-50 samples	38	3/31/2019	6/30/2019	7/1/2019
Must increase by more than 50 samples	18	6/30/2019	9/30/2019	10/1/2019

Lead and Copper

- Coordinating efforts with proposed rule changes to avoid confusion and redundant effort
- Proposed rule requires supplies to submit a preliminary inventory and verified sampling pool
- DEQ proposed aligning the elimination of consecutive monitoring with submittal of the sampling pool



RTCR & Site Selection



Next Steps

Next Steps

- Don't wait! Begin planning and identifying new sites immediately.
- DEQ will send letters with system-specific requirements
 - Sampling requirements
 - Siting plan submittal deadlines
 - Implementation dates
- Once LCR revisions are certain, DEQ will provide additional information/training and specific next steps



Questions