ADEM Drinking Water Update

AUBREY WHITE, CHIEF DRINKING WATER BRANCH
Snapshot

583 Permitted public water systems in Alabama
98% Compliance rate for health-based standards
94% Compliance rate for monitoring and reporting
Hot Topics

Consumer Confidence Report
America’s Water Infrastructure Act of 2018
GroupCast
PFAS
FIFRA
The Curious Case of Albert Stein
Consumer Confidence Reports
January 4, 2019

MEMORANDUM

TO: Water System Officials

FROM: Audrey White, Chief
Drinking Water Branch

RE: 2018 Consumer Confidence Reports

Attached is the new Consumer Confidence Report (CCR) Certification Form, which is also available at http://adem.alabama.gov/programs/water/WorkYourWater.htm. You may begin using this newly drafted form for the 2018 CCR reports that are due by June 30, 2019. The new form is in a checklist format, and, for interested systems, lists the steps required to utilize Internet delivery to your customers. We hope the new format will be helpful to you.

Please be reminded that if your system incurred any violations during calendar year 2018, they must be noted in the CCR. If you plan to use the CCR to meet public notice requirements for a violation, each customer must receive a copy of the report.

Systems that sell water to other systems are required to deliver information needed to complete the CCR to the buyer system by April 1, 2019. As the Consumer Confidence Report is critical to providing your customers with information about their drinking water quality, please be advised that systems who fail to meet the deadlines in 2020 may be subject to enforcement action.

Should you have any questions, please contact your district inspector directly or you may contact the Drinking Water Branch at (334) 271-7773.
Drinking Water - Consumer Confidence Report (CCR) Certification Form

Community Water System Name: ____________________________

Public Water System Identification No: ____________________

Year: ____________________

Important: Community water systems are required to both deliver a copy of the CCR to each customer, and reach non-bill paying customers using “good faith” efforts. For direct delivery, you may choose either traditional or electronic methods, or both.

1. A community water system that sells water to another community water system shall deliver the information needed to complete the CCR to the buyer system by April 1st. If mutually agreed upon in writing, seller and buyer may select a different date for delivery.
   Date Accomplished: _____ OR: □ Not applicable

2. For systems that were cited for violation(s) during the CCR reporting year:
   □ The CCR contains information on the violation(s) and any required text
   OR: □ Not applicable.

3. For systems serving a population of at least 100,000 (100,000 customers):
   □ Good faith effort made to reach consumers who do not receive bills (Complete #11 below).
   □ Copy posted to publicly accessible website. Date: ____________
   □ Copy mailed to all customers*. Date: ____________
   *The system may optionally distribute the CCR electronically by completing #9 and/or #10 below.

4. For systems serving a population of 10,000 – 99,999 (10,000 – 99,999 customers):
   □ Good faith effort made to reach consumers who do not receive bills (Complete #11 below).
   □ Copy mailed to all customers*. Date: ____________
   *The system may optionally distribute the CCR electronically by completing #9 and/or #10 below.

5. For systems serving a population of 500 – 9,999 (500 – 9,999 customers):
   □ Choose ONE of the following:
   □ Notify customers in writing the date the CCR will be published in newspaper (Date: ____________)
   □ Publish CCR in one or more local papers (Date: ____________)
   □ Mail copy of CCR to all customers*. Date: ____________
   *The system may optionally distribute the CCR electronically by completing #9 and/or #10 below.

6. For systems serving a population less than 500 (500 or fewer customers):
   □ Choose ONE of the following:
   □ Notify customers in writing the CCR is available upon request (Date: ____________)
   □ Display CCR in a prominent place easily accessible to consumers (Date: ____________)
   □ Mail copy of CCR to all customers*. Date: ____________
   *The system may optionally distribute the CCR electronically by completing #9 and/or #10 below.

7. Applicable to all systems:
   □ Copy provided to local health department. Date: ____________
   □ Copy provided to any public library within 3 miles of water system office. Date: ____________

ADEM Form No. 347 M-2 XX/XX/XXXX DRAFT
2018 CCR Autopsy

No CCR

Late submittals

Violations not listed in report

CCR published in newspaper before customer notification
Electronic delivery (web and/or email) is encouraged. It is critical that systems using electronic delivery give customers an option to receive a paper copy. A database of those wishing to receive a paper copy must be established and regularly updated.
America’s Water Infrastructure Act of 2018
America’s Water Infrastructure Act of 2018

Authorizes electronic delivery of CCRs

New language in CCRs required for certain exceedances and corrosion control efforts; improvements for readability, risk communication, and accuracy; systems serving >10,000 must provide a CCR at least biannually.
America’s Water Infrastructure Act of 2018

States to encourage development/use of asset management plans. Repeat violators may be required to assess consolidation options. Systems serving 3,300-10,000 will be required to participate in UCMR to the extent funding and laboratory space is available. Systems serving >3,300 to conduct risk assessments.
## Risk Assessment and Emergency Response Plan Deadlines

<table>
<thead>
<tr>
<th>Population Served</th>
<th>Risk Assessment</th>
<th>Emergency Response Plan*</th>
</tr>
</thead>
<tbody>
<tr>
<td>$\geq 100,000$</td>
<td>March 31, 2020</td>
<td>September 30, 2020</td>
</tr>
<tr>
<td>50,000-99,999</td>
<td>December 31, 2020</td>
<td>June 30, 2021</td>
</tr>
<tr>
<td>3,301-49,999</td>
<td>June 30, 2021</td>
<td>December 30, 2021</td>
</tr>
</tbody>
</table>

*Emergency response plan certifications are due six months from the date of the risk assessment certification. The dates shown above are certification dates based on a utility submitting a risk assessment on the final due date.
AWECS
(The application formerly known as GroupCast)
Alabama Water/Wastewater Emergency Contact System (AWECS)

AWECS is a communication service to be used in times of emergencies and for occasional news and reminders. System has the ability to call, email, and/or text. During emergencies, it will be used to survey systems for outages and needs. Up to 3 contacts per water system.
Consumer Confidence Report Reminder

This is a message from the Alabama Department of Environmental Management’s Drinking Water Branch

Dear Aubrey White,

The 2018 Consumer Confidence Report for ADEM ADMIN is due to ADEM by June 30, 2019. If you have already submitted your report, please disregard this message. If not, please download the [new form] and submit your report before the deadline. If you have any questions about the report, please contact your district inspector.

PWSID #: AL9999999

Please do not reply to this email, as the return address is not monitored. If you need to reach us, please contact your district inspector, or call the Drinking Water Branch at (334) 271-7773.
Drinking Water System Status Update

Multiple people from your water system may have received this survey; it is only necessary to submit a single response per water system.

* Required

System Name *

AUBREY COUNTY WATER AUTHORITY

Name of person completing this survey *

Aubrey White

NEXT

Never submit passwords through Google Forms.
Lead Update

School lead testing continues (final year)

Daycare/Pre-K program to begin late 2019

LCR compliance activities are ongoing; review sampling sites, lead inventories as needed.

Action Level Exceedance – East Lauderdale

Long-term revisions to the LCR announced
MEMORANDUM

TO: Water System Officials
FROM: Aubrey White, Chief
       Drinking Water Branch
RE: 2019 Lead and Copper Rule (LCR) sampling during 2019, we offer the following guidance that is applicable to all community water systems.

1. It is essential that water systems have an accurate, up-to-date distribution system materials inventory. When your system prepared its initial materials inventory for the LCR, it should have reviewed system plans, dates of construction, building permit records, water main and meter replacement records, etc., to ensure that any lead service lines (LSIs), distribution components, and lead plumbing components were accounted for. In the years since then, any additional lead components that have become discovered should have been added to the inventory and any components that were removed or replaced should also have been accounted for. If your materials inventory has changed recently, please submit a copy with your next LCR sampling plan.

2. To the extent there are LSIs in the system, at least 50% of the sample sites shall be from LSIs. Note that this definition of an LSI includes both the line from the main to the meter, and the meter to the building. If only the portion of the service line from the meter to the residence is lead, it will count as an LSI.

3. The procedure for collecting samples from LSIs differs from the procedure for a tap sample. Samples from LSIs must be collected by the system, rather than the customer. When sampling LSIs, the entire line may be collected via a direct tap into the LSI, or by building the volume of water between the tap and the LSI, until either the calculated amount of water between the tap and service line has been discharged, or for single-family residence until there is a significant change in temperature.

4. Sampling sites are classified by a tiered system. Community water systems shall select sampling sites from tier one first. If there is an insufficient number of tier one sites, this must be documented and the remaining sites shall be selected from tier two. If there is an insufficient number of the one and tier two sites, this must be documented and samples shall be collected from tier three. If there are no suitable tier one, two, or three sites, then the system may select sites representative of the system but not conforming to the tier criteria.

[Addresses and phone numbers of various offices included]
PFAS
PFAS - Status

All systems with known finished water above the lifetime health advisories for PFOA and PFOS have installed treatment, or are in the process of design/installation.

EPA regulatory determination for PFOA and PFOS expected in 2019.

Congressional action on PFAS possible this session.
PFAS Sampling Program

Systems not sampled during UCMR3 will be required to screen for PFAS in 2020.

Surface plants – 4 quarterly samples.

Ground sources – 2 semiannual samples.

Samples to be collected from entry point to the distribution system.

Must use laboratory certified by ADEM for EPA Method 537.1. Report all 18 PFAS substances listed in method.
PFAS Sampling Program

The results will be used to determine if there are any other water systems with levels of PFOA and PFOS over the EPA combined health advisory of 70 ppt.

Should sampling find levels over the HA, ADEM will work with ADPH and the water system to notify the public, determine appropriate ongoing monitoring, and assist with any source or treatment changes.
FIFRA
For 10 years, a chemical not EPA approved was in their drinking water

By Sara Ganim, CNN
Video produced by Matthew Gannon and Margaret Dawson
Updated 11:11 AM ET, Wed November 28, 2018

(CNN) — For 10 years, some residents in Denmark, South Carolina, have been suspicious of the
Sen. Bernie Sanders’ campaign to make donation for Denmark toxic water crisis

DENMARK, S.C. (WIS) - Following Sen. Bernie Sanders’ last visit to Bamberg County where he meet with Denmark citizens impacted by the ongoing water crisis, his South Carolina campaign director will join with Denmark residents and community leaders at the Rally for Safe Clean Water on May 25.
Source Water Assessment Reminder

Source Water Assessments should be reviewed and updated on a regular basis.

Contaminant source inventories are often out of date.
Surface sources must have workable contingency plans.
The Curious Case of Albert Stein

(OR, WHY THE LEAD AND COPPER RULE IS A GOOD THING)
AN IMPORTANT DECISION.—The long pending suit of the State of Alabama vs. Albert Stein, accused of “supplying the citizens of Mobile with poisonous water,” called in our court some time ago and venue changed to Baldwin county, was closed before Judge Rapier on Thursday, and the defendant found guilty and fined $2000—the highest penalty allowed by the statute. We learn from parties who were in attendance at the trial, that the water of the Mobile water works, of which Mr. S. is the proprietor, along with water taken from a brook in Baldwin county, was subjected to a chemical analysis before the jury, and that the effect produced upon the water works water was exactly the same as upon the brook water dropping a handful of shot into it. Proof was also received of the poisonous qualities of lead. Another point proved, as we learn from the same source, was, that in all the cities into which water has been introduced through pipes, iron pipes are used as leading pipes universally, while the Mobile Water Works have, in a great number of instances, used lead pipes for leads.

Another suit, Same vs. Same, for non-fulfillment of contract to supply a sufficient quantity of water for extinguishing fires, was called and laid over on account of absence of witnesses.—Mobile Advertiser.

Mr. Stein is the same gentleman who superintended and planned the construction of our Reservoir in this city. He married a daughter of the late Girard Troost.
State of Alabama vs. Albert Stein

In 1861, the Alabama Supreme Court overturned the conviction. The Court found that the contract between Stein and Mobile only required him to supply water, with no stipulation on the quality of water supplied.
AUBREY WHITE, CHIEF
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