



ADEM Drinking Water Update

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Drinking Water Branch

October 14, 2025



Today's Topics

- Organizational Structure
 - Current State of Affairs
 - Regulatory Reminders
 - UCMR5
 - Cybersecurity
 - RRA/ERP and EPA Enforcement
 - Looking Ahead
 - EMOR
 - Consumer Confidence Report Rule Revisions
 - Lead and Copper Rule Improvements
 - PFAS Update
- Resources/Links

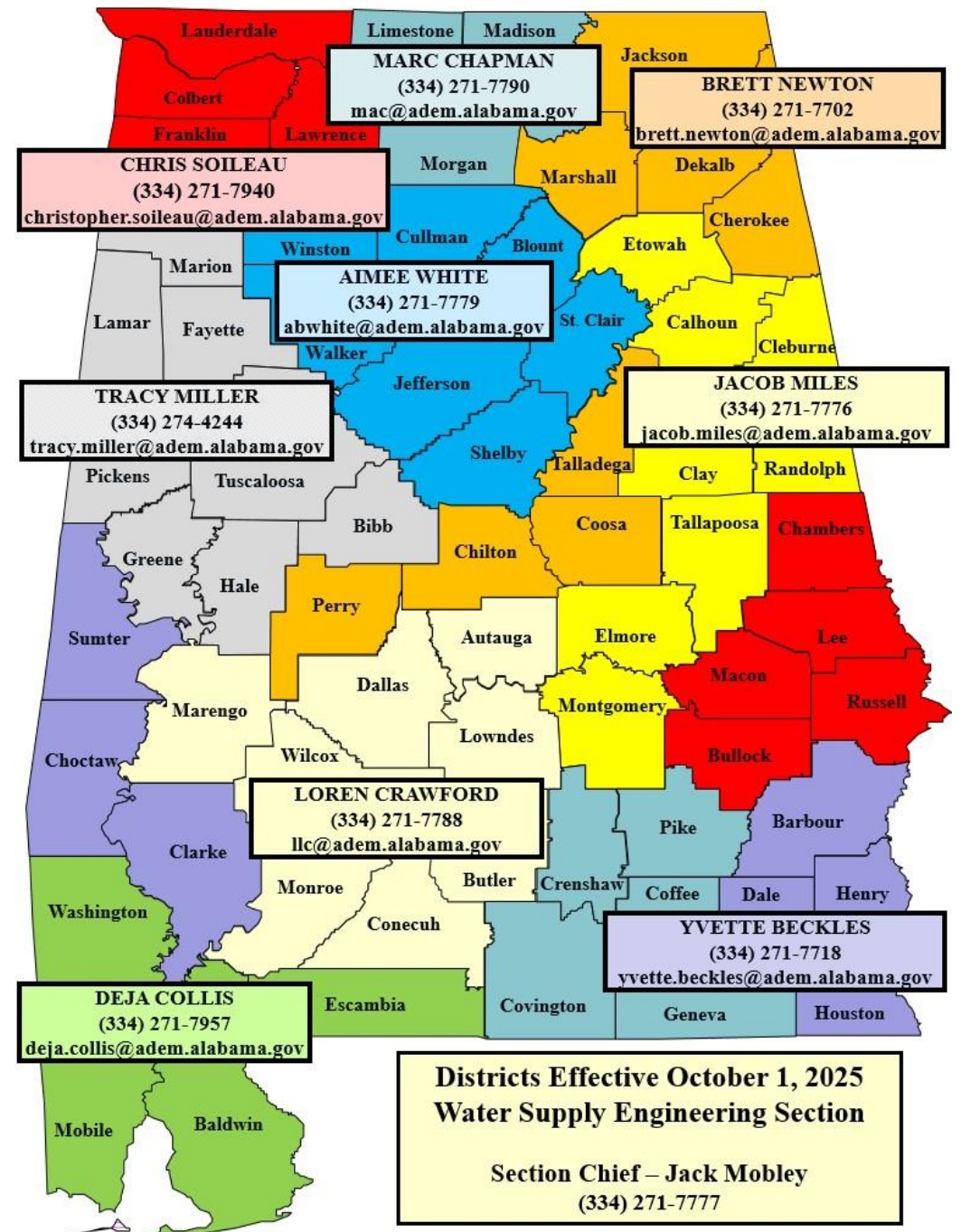


Organizational Structure

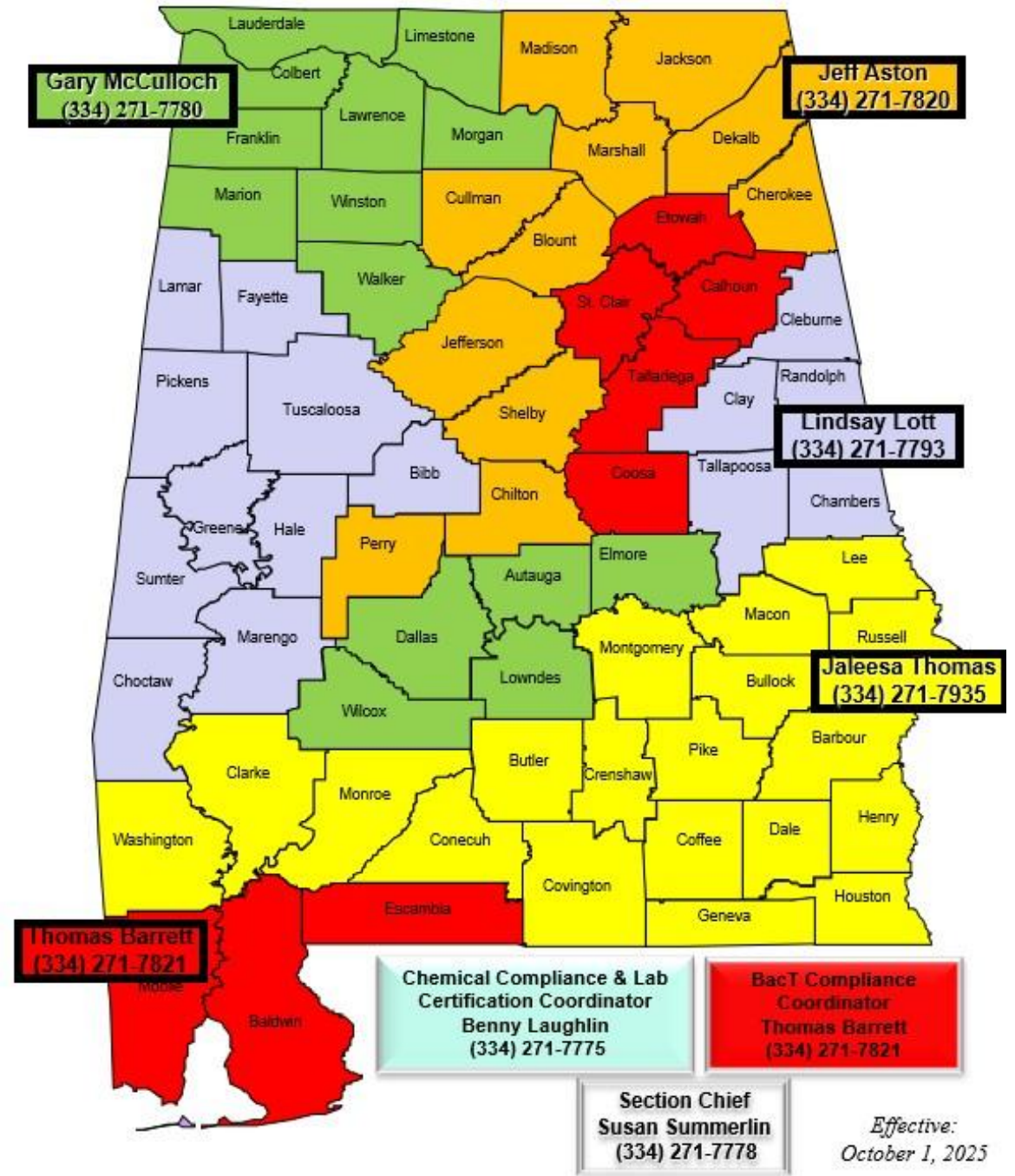
Water Division/Drinking Water Branch



Water Supply Engineering Section



Compliance Assurance Section





Special Focus Contacts

- AWOP
 - Aimee White
- LCRR/LCRI/Inventories
 - Jacob Miles
- Compliance
 - Tom Barrett (Bacteriological)
 - Benny Laughlin (Chemical)
- Lab Certification
 - Benny Laughlin
- Consumer Confidence Report
 - See your district inspector
- Lead Testing in Schools
 - Susan Summerlin
 - Jeff Aston
- PFAS
 - Marc Chapman
- Capacity Dev./Asset Mgmt.
 - Brett Newton
- Funding
 - ADEM SRF – Brian Espy
- Source Water Assessment
 - Loren Crawford



Current State of Affairs

What's Happening Right Now



Regulation Reminders

- Finished Water Storage
 - 335-7-7-.04 (Effective April 14, 2022)
 - Plan, inspection/cleaning every 5 years, reporting and corrective actions
- All storage tanks constructed prior to January 1, 2022, shall have an initial inspection/cleaning under this regulation completed by **December 31, 2027.**



Regulation Reminders

- Consumer Confidence Reports
 - CY2024 CCRs currently under review
 - If used for public notice of violation, must meet rule requirements for language and distribution
 - Must include inventory of violations, formal enforcements, assessments, UCMR5 information, and more



UCMR5 Overview

- 29 PFAS plus lithium
- All PWS serving 3,300 or more people
- Representative sample of systems serving fewer than 3,300
- EPA pays for analytical cost for systems serving 10,000 or fewer
- January 2023 – December 2025
- Results made available by EPA on their UCMR5 Data Finder (<https://www.epa.gov/dwucmr/fifth-unregulated-contaminant-monitoring-rule-data-finder>)
- EPA likely contacting PWSs that have yet to complete UCMR 5 monitoring



Cybersecurity

- March 3, 2023 – EPA issued its Cybersecurity Memo
- June 20, 2023 – ADEM Drinking Water Branch sent a memo to water systems outlining how it would implement the requirement.
 - EPA contractor, 3rd party, or self-assessment acceptable
 - Checked at sanitary survey
- July 12, 2023 – 8th US Circuit Court of Appeals issues a stay of EPA memo until a state challenge could be heard.
- October 11, 2023 – EPA withdrew its Cybersecurity Memo
- June 28, 2024 – Alabama finalizes its Cybersecurity Action Plan; Office of Information Technology will develop webinar and templates, ADEM will follow up during inspections.

Cybersecurity Resources

ADEM has published a new page with links to Cybersecurity Resources for Public Water Systems.



Cybersecurity Resources for Public Water Systems

Recent attacks on drinking water and other utilities have increased interest in protecting Alabama's critical infrastructure from bad actors in cyberspace. ADEM strongly encourages each water system to take commonsense security steps and conduct periodic cybersecurity assessment to prevent such attacks. Some helpful resources can be found here:

EPA Webpage on Cybersecurity Assessments: Here you can find information about incorporating cyber threats and responses in your utility's AWIA Emergency Response Plan, conducting cybersecurity assessments, and available technical assistance programs.

EPA's Free Third-Party Cybersecurity Evaluation Program: Sign up here to receive information on free third-party assessments conducted by an EPA contractor. These assessments are simple, quick, and free.

Cybersecurity & Infrastructure Security Agency: CISA has numerous tools, resources, and information tailored to water utilities. They also conduct free cybersecurity assessments.

Alabama Office of Information Technology: The State of Alabama has information regarding cybersecurity on its website for citizens and government agencies.

FBI Internet Crime Complaint Center: Report cyber incidents here.

<https://adem.alabama.gov/programs/water/drinkingwater/pws-cybersecurity.cnt>



RRA, ERP, and EPA Enforcement

- AWIA Act Section 2013 (10/23/2018), amended Section 1433 of the SDWA
- Certification Deadlines for risk and resilience assessment (RRAs) and emergency response plans (ERPs)

Population Served	Initial RRA Deadline	RRA Update Deadline
≥ 100,000	March 31, 2020	March 31, 2025
50,000 – 99,999	December 31, 2020	December 31, 2025
3,301 – 49,999	June 30, 2021	June 30, 2026

Population Served	Initial ERP Deadline	ERP Update Deadline
≥ 100,000	September 30, 2020	September 30, 2025
50,000 – 99,999	June 30, 2020	June 30, 2026
3,301 – 49,999	December 31, 2021	December 31, 2026

RRA, ERP, and EPA Enforcement



Resources are available

<https://www.epa.gov/waterresilience/awia-section-2013>



Looking Ahead

What's Coming Down the Pipe



EMOR Now Available!

- **Release Schedule**

- Made available for optional use on February 28, 2025
- Routine updates to incorporate feedback and new features (1-2x/month)
- Emergency updates to fix any breaking issues (ASAP)
- Will be required for the October 2025 MOR Reporting Period (due November 10, 2025)
- edwr@adem.alabama.gov



CCR Rule Revisions

Reports delivered by July 1, 2027

- **Population > 10,000**
 - CCR must be distributed twice per year
 - First report due July 1st
 - Summary of previous calendar year
 - Second report due December 31st
 - Summary of previous calendar year, plus 6-month updates on violations, action level exceedances, & UCMR results
- **Wholesale CWSs**
 - Must deliver info to buying PWSs by April 1st & October 1st

https://www.epa.gov/system/files/documents/2024-12/ccr-rule-comparison-factsheet_508.pdf

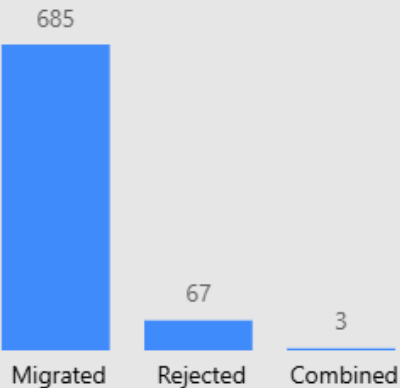
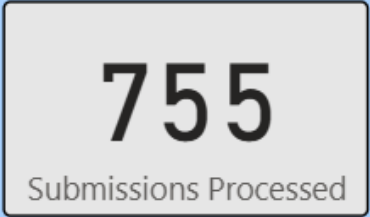
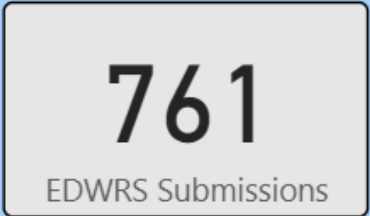


Lead & Copper Rule Improvements (LCRI)

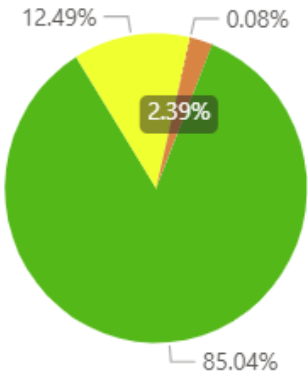
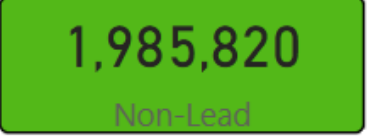
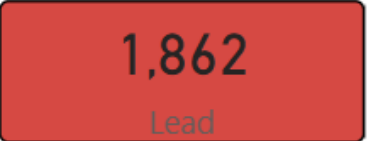
Compliance Date – November 1, 2027:

- **Initial Lead Service Line Inventories**
 - Due October 16, 2024
- **Lead Action Level Lowered: 15 ppb to 10 ppb**
 - Effective November 1, 2027
- **Action Level Exceedances now Tier 1, require 24-hour public notice**
 - Use EPA templates, Effective October 2024
- **All educational & public notice materials for LSL inventories**

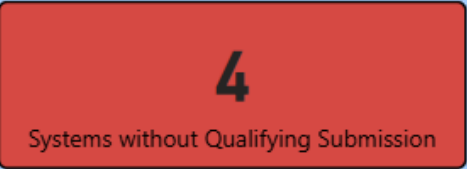
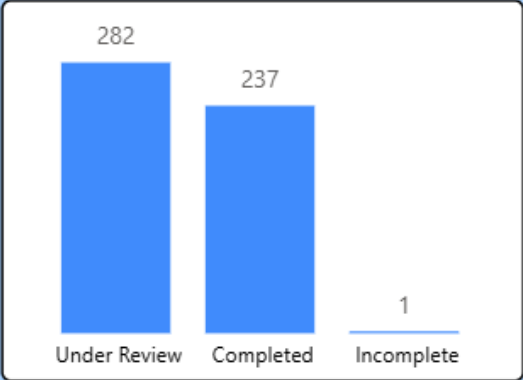
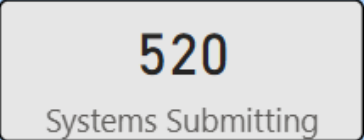
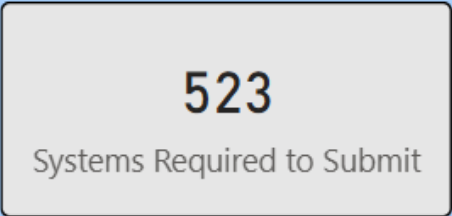
Submission Overview



Inventory Data



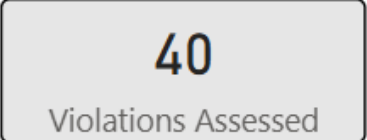
Water System Status



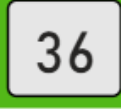
Compliance Summary

4G - Failure to Submit (Reporting)

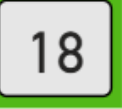
Systems who failed to submit the inventory by 10/16/2024 will receive this violation.
Tier 2 Notice required (365 Days)



Returned to Compliance

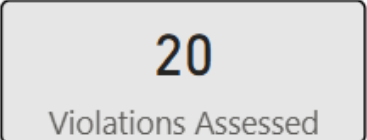


Notices Completed



2E - Failure to Develop (Treatment Technique)

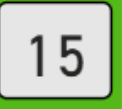
Systems who fail to develop a service line inventory, review all required records, make it publicly available, or don't include all required information will receive this violation.
Tier 2 Notice is Required (30 Days)



Returned to Compliance



Notices Completed

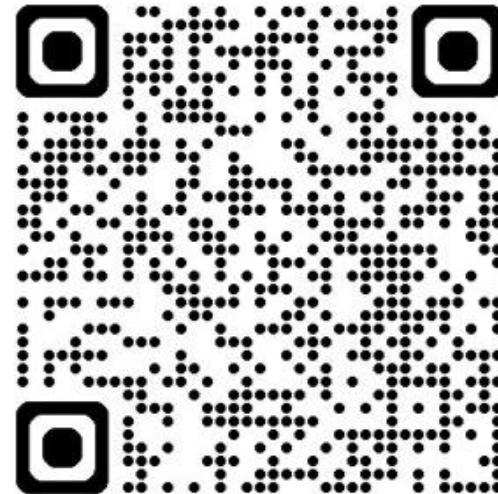


*Twenty (20) 2E violations were assessed for "Failure to Develop". Submitted inventories are currently being reviewed to assess additional 2E violations

10/9/2025
7:08:23 PM
Last Refresh Date

Tier 1 Public Notice for Lead ALE

- Starting October 16, 2024, Action Level Exceedances (ALEs) requires materials to be supplied to all persons served by the Water System as soon as possible but no more than 24 hours after learning of the ALE.
- Public Notification and Education Materials as well as templates can be found on the EPA website.





PFAS Update: 5/14/2025

<https://www.washingtonpost.com/climate-environment/2025/05/13/epa-pfas-drinking-water-rule/>

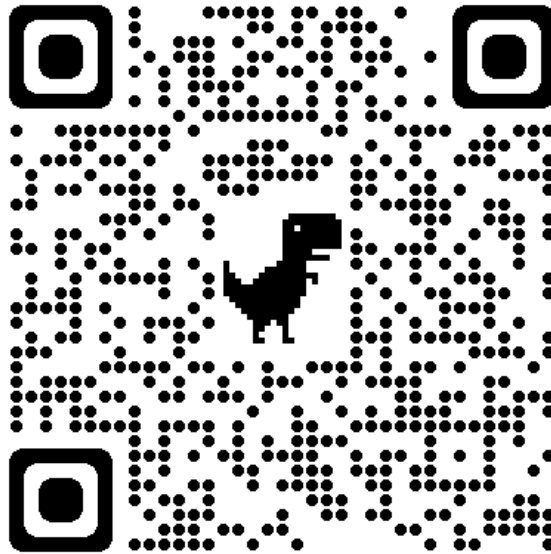
- Several lawsuits have been filed over PFAS rule
- EPA planning compliance date extension from 2029 to 2031
- EPA has announced individual PFAS MCLs will be rescinded & reconsidered:
 - PFNA, PFHxS, PFBS, GenX Chemicals
 - Hazard Index
- EPA expects new rule-making process to begin in Fall of 2025 with finalization in 2026



Resources/Links

Resources for Water Systems

EPA NPDWR PFAS



<https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>

ADEM SRF Site



<https://adem.alabama.gov/programs/water/srf.cnt>

Quick Links

DRINKING WATER WATCH

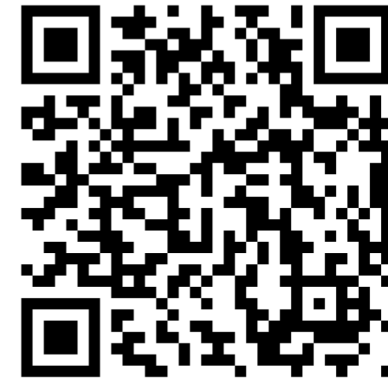


[HTTP://DWW.ADEM.ALABAMA.GOV/DWW](http://DWW.ADEM.ALABAMA.GOV/DWW)

VIEW INFORMATION ABOUT YOUR DRINKING WATER SYSTEM, SUCH AS INVENTORY, SAMPLE SCHEDULES, COMPLIANCE SCHEDULES, SAMPLE RESULTS, VIOLATIONS* AND ENFORCEMENT*

*ONLY SHOWS FEDERALLY REPORTABLE VIOLATIONS & ENFORCEMENT.

AWECS (EMERGENCY CONTACTS)



[HTTP://APP.ADEM.ALABAMA.GOV/AWECS](http://APP.ADEM.ALABAMA.GOV/AWECS)

UPDATE YOUR CONTACTS THAT ADEM WILL USE IN THE EVENT OF EMERGENCIES OR INFORMATIONAL UPDATE CORRESPONDENCES.



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