

ADEM Drinking Water Update & EMOR Information

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Water Supply Engineering Section
October 2026



Today's Topics

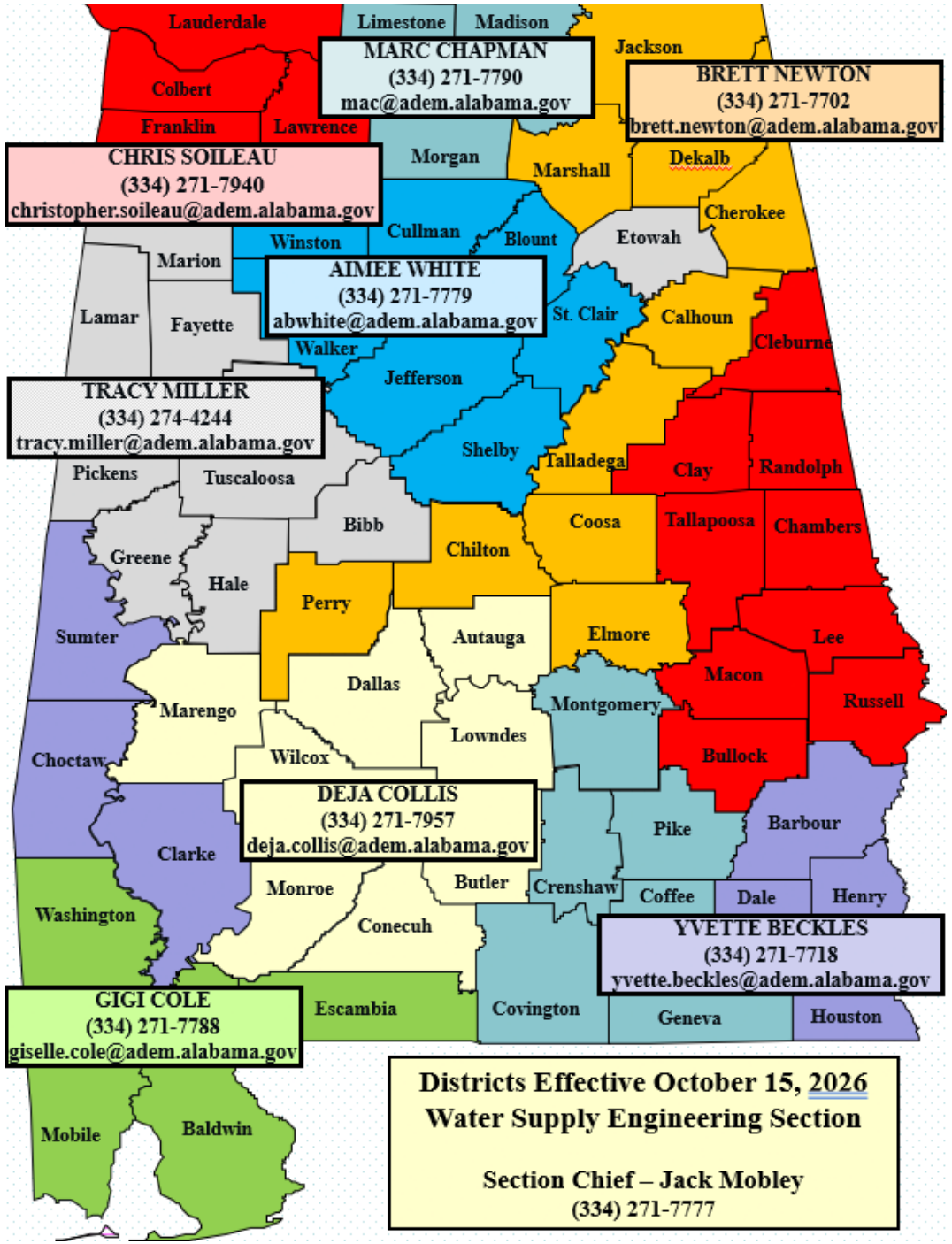
- ADEM DW Organizational Structure
- Current State of Affairs – What's Happening Right Now
- Current State of Affairs with Lead & Copper, Lead Service Lines (LSLs)
  - Lead & Copper Rule Revisions (LCRR)
  - Sampling Requirements
  - Public Notification Guidance
- Looking Ahead with Lead & Copper Rule Improvements (LCRI)
  - Baseline LSL Inventories
  - LSL Replacement
  - Updated Lead and Copper Sampling Plans
  - Other Updates
- EMOR
- PFAS update



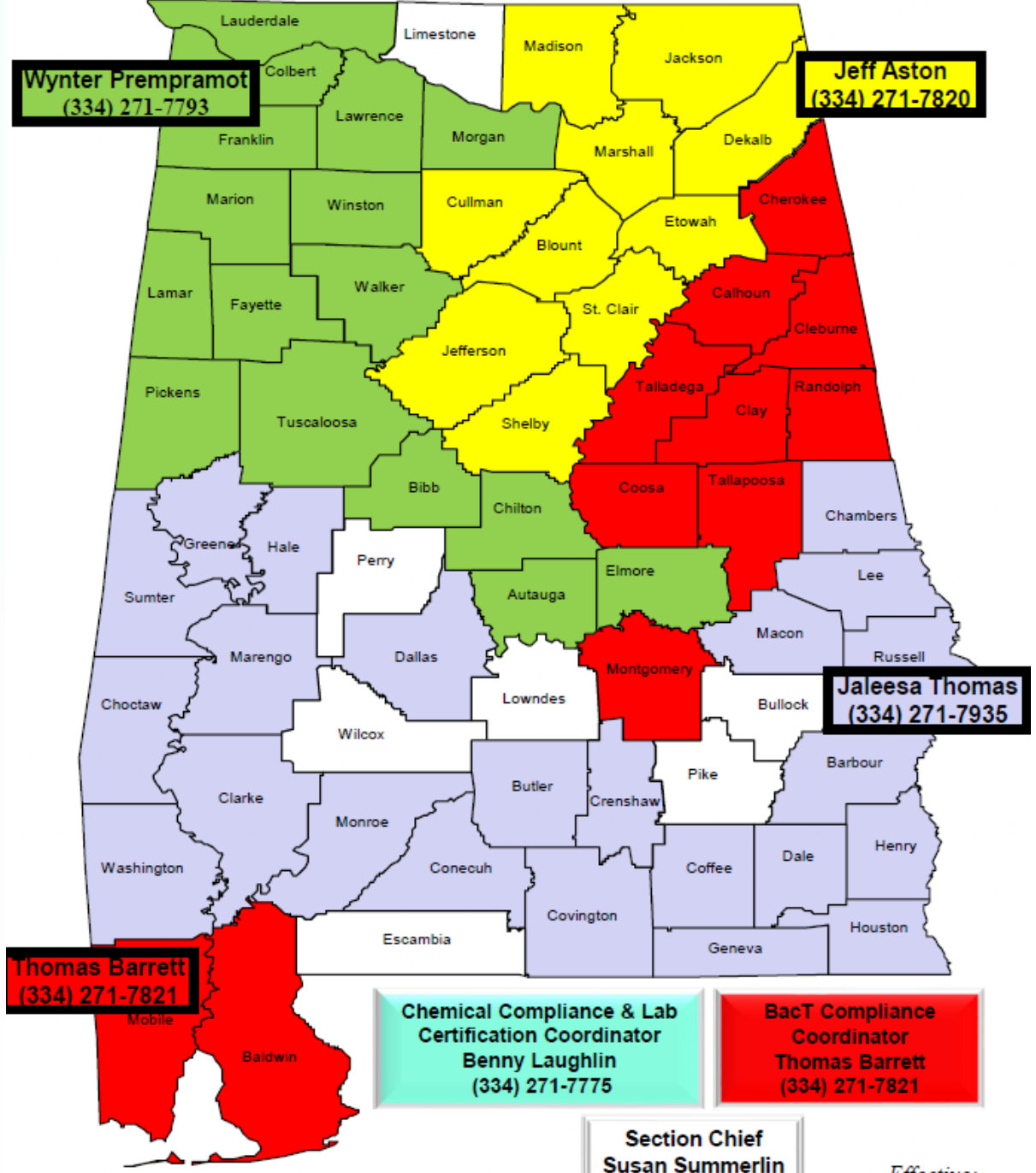
Organizational Structure

Drinking Water Branch

Water Supply Engineering Section



Compliance Assurance Section



Effective: October 1, 2026



Special Focus Contacts

- *AWOP*
  - Aimee White
- *LCRR/LCRI/Inventories*
  - Chris Soileau
- *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 & Alex Chavers
- *Source Water Assessment*
  - Tracy Miller



Current State of Affairs

What's Happening Right Now



Regulation Reminders

- Operating Permit Renewals (335-7-4-.02)
  - Six-year cycles for community systems
  - Ten-year cycles for non-community systems
  - Majority of renewals are in 2027 & 2028
- Application & fee due 180 days before expiration
  - ADEM Form #490
  - SW: $4,595, GW: $3,715, Purchase: $2,995
  - Fee increases imminent
  - Failure to submit may result in enforcement!!!
- Construction Permits (335-7-4-.03)
  - Quarterly progress reports required



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.**



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



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

EPA Upcoming RRA, ERP, & Cybersecurity Webinars & Events



https://www.epa.gov/cyberwater/epa-cybersecurity-water-sector

https://www.epa.gov/waterresilience/register-epa-water-utility-resilience-events

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



Current State of Affairs

What's Happening Right Now with Lead & Copper



Lead & Copper Rule Revisions (LCRR) – What Hasn't Changed

- **Monitoring Requirements, Frequencies**
- **LSL Sampling & Reporting**
  - ≥50% (or as many as available if unable to reach 50%) of samples must be taken **from** lead service lines if lead services are within the system.
  - Within 10 days following the monitoring period, ADEM must receive the results of tap monitoring, Form #405, and an example of what was delivered to the customers who did the monitoring.
- **Lead action level still 0.015 mg/L, 90th percentile until November 1, 2027, when it will be 0.010 mg/L**



Public Notification Guidance

EPA has produced guidance and templates for the following required notices:

- **Notification of Known or Potential Service Line Containing Lead**
  - 30-Day Notice of Service Line Material
- **Tier 1 (!!) Public Notice for Lead Action Level Exceedance**
  - 24-Hour Notification of Action Level Exceedance

https://www.epa.gov/dwreginfo/lead-and-copper-rule-implementation-tools

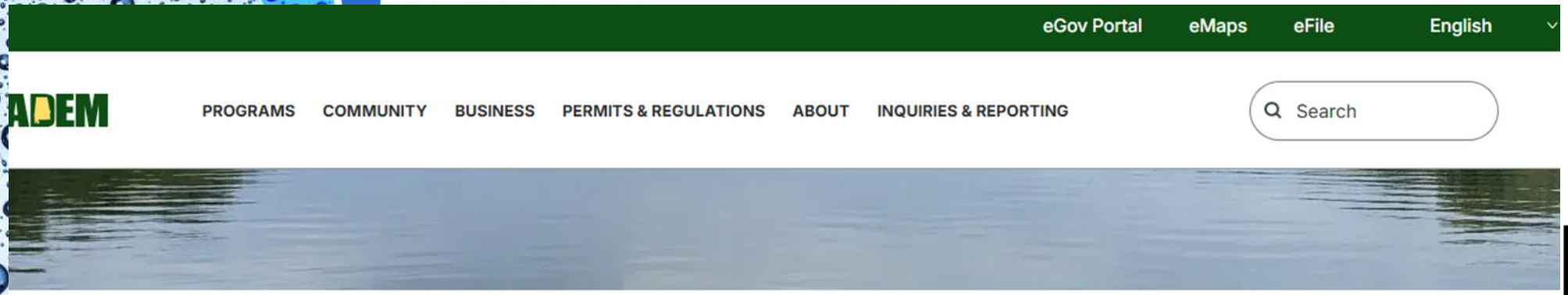


Tier 1 Public Notice for Lead ALE

- 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.

www.epa.gov/dwreginfo/lead-and-copper-rule-implementation-tools

ADEM Lead & Copper Web Page



Lead and Copper Information for Water Systems

The Alabama Department of Environmental Management is the primacy agency for implementation of the Lead and Copper Rule in Alabama. ADEM's lead and copper regulations are in Division 7, specifically Chapter 335-7-11. The State's lead ban is in Chapter 335-7-8, which became effective January 4, 1989.

On December 16, 2021, revisions to the EPA Lead and Copper Rule (LCRR) became effective with a compliance date of October 16, 2024. Simultaneously, EPA announced that while the inventory requirements of the new rule would remain intact, the agency plans to make further revisions to the remainder of the rule (Lead and Copper Rule Improvements, or LCRI). EPA plans to announce the LCRI and make it effective by October 16, 2024. ADEM plans to incorporate the federal rule into its regulations once the LCRI is finalized.

https://adem.alabama.gov/programs/water/drinkingwater/leadcopper.cnt



Looking Ahead w/ Lead Lines

What's Coming Down the Pipe to Prepare For



Items Due Right Around the Corner - LCRI

- **Baseline SL inventories due November 1, 2027**
  - 40 CFR § 141.84(a)(2)
  - "Connectors" also to be included
    - Lead, Non-lead, unknown, no connector present
- **LSL replacement plans due November 1, 2027**
  - If applicable
- **Updated Lead/Copper Sampling Plan due January 1, 2028**
  - Five tiers instead of three tiers
- **Updated Water Quality Parameter Sampling Plan**
  - If applicable
- **List of schools & daycares served by PWS**
  - Excludes facilities not served by a LSL, GRR or Unknown and built after January 1, 2014



Electronic Monthly Operating Reports

EMORS



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)
  - Was made a requirement on October 1, 2025
  - Contact your inspector w/ any issues



EMOR

- **Key Features**
  - Contained within EDWRS (uses existing accounts)
  - Default requirements were applied based on system/facility source and type
  - Multiple options for direct data entry and exportable Excel template for copy/paste
  - Streamlined submission process
  - Immediate report availability



New Features Available

- Raw Flows from source facilities will be summed up and added to the general flow balance form when preparing report by default
  - Can be edited & recalculated
- Submission date will automatically be added to SDWIS immediately after MOR is submitted
- Ability to import generated Excel template back into EMOR after completion
- Adding max/min/avg values on flows, residuals, turbidities, etc.
- 4-log form coming soon



Brief PFAS Update

Where things currently stand



PFAS: EPA Update 6/16/2026

- **April 2024 – PFAS NPDWR published in Federal Register**
  - MCLs for PFOA, PFOS, GenX, PFNA, PFHxS, Hazard Index
- **May 2025 – EPA issues press release**
  - Intent to keep retain MCLs for PFOA, PFOS
  - Intent to rescind all other MCLs, including Hazard Index
- **September 2025 - EPA files motion to vacate to U.S. Court of Appeals rescinding MCLs**
- **January 2026 – DC Court denies EPA's motion to vacate**
- **May 2026 – EPA announces next steps**
  - Recession of regulatory determinations & provisions for PFHxS, PFNA, GenX, PFBS, Hazard Index
  - Proposed PFOA & PFOS Compliance Extension Rule



PFOA & PFOS Extension Proposal

- **April 26, 2029 RAA compliance deadline**
- **Exemptions required for 2-year compliance deadline extensions (April 25, 2031)**
  - Process includes provision to ensure exemptions will not result in an unreasonable health risk (<12 ppt for PFOA and PFOS)
  - Currently granted by EPA
- **PWS applications must be submitted within 180 days of final rule promulgation**
- **Tier 3 public notice required with exemption**
  - Repeated annually for duration of exemption
- **Public Hearing July 7, 2026**
  - Comments received until July 20, 2026
  - Final regulations no later than November 2027



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

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

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



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