

Service Connection

The Maine Drinking Water Program Newsletter

"Working Together for Safe Drinking Water"

Summer 2016 • Volume 24, Issue 2



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Lead and Copper Sampling: A Crash Course

Holly Hockertlotz, Rule Specialist

Sampling Frequency

For systems required to complete lead and copper sampling (i.e., non-transient, non-community and community systems), lead and copper sampling must be completed on one of three sampling frequencies: six-month, annual, or triennial sampling. All new public water systems and public water systems that have had an action level exceedance of lead and/or copper are required to complete two six-month rounds of lead and copper sampling. Once a system has completed two consecutive six-month rounds of lead and copper sampling where the 90th percentile is below the action level, the system is eligible to move to annual sampling.

For systems with annual or triennial sampling frequencies, samples are required to be collected between June 1 and September 30 and within the designated sampling year for those systems on triennial sampling. Samples collected outside the designated testing period cannot be counted toward meeting the minimum sampling requirement used to determine if compliance with the lead and copper rule has been met. Alternate monitoring periods, consisting of four consecutive months within a calendar year, may be approved at the Drinking Water Program's discretion. Once a public water system has completed three consecutive annual rounds of lead and copper sampling where the 90th percentile is below the action level, the system is eligible to move to triennial sampling.

Sampling Collection

It is critical to collect lead and copper samples in accordance with the Environmental Protection Agency (EPA) guidance and from appropriate sample locations. The EPA issued a memorandum on February 29, 2016, reiterating sampling guidance issued in 2006. The EPA stressed that public water systems should not recommend that homeowners remove or clean aerators prior to or during sampling for lead and copper. The EPA does not recommend a pre-stagnation flush. In other words, drinking water should be used as it normally is during the 24 hours prior to sampling and then allowed to remain motionless in the pipes for at least 6 hours prior to collecting lead and copper samples. There is no upper limit on the stagnation period. Finally, the EPA recommends the use of wide-mouthed bottles to allow the collection of lead and copper samples with a flow rate more consistent with how consumers use tap water.

LT2: Round 2 Source Water Monitoring for Surface Water Systems Serving 10,000-49,999

Jennifer Grant, Rule Specialist

Attention Surface Water Systems

Round 2 source water monitoring requirements, part of the Long Term 2 Enhanced Surface Water Treatment Rule, are upcoming. If you are a surface water system serving a population of 10,000-49,999, you will be receiving a letter this summer from your Public Water System (PWS) Inspector outlining your system's specific monitoring requirements. Surface water systems serving a population less than 10,000 begin monitoring at a later date. Below is a table summarizing the important deadlines for your system based on filtration type and population served. Please contact your PWS Inspector with any questions or concerns.

LT2: Round 2 Source Water Monitoring

System Size/Type	Type of Monitoring	Begin Date
10,000-49,999 Filtered and Unfiltered	Crypto- sporidium	Oct. 1, 2016
<10,000 Filtered	E. coli	Oct. 1, 2017
<10,000 Unfiltered	Crypto- sporidium	April 1, 2019



Maine Center for Disease
Control and Prevention

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Paul R. LePage, Governor

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DIRECTOR'S *Corner*



Changes at the Drinking Water Program

Many years ago the staff at the Drinking Water Program adopted a philosophy of “continuous improvement” in recognition that 1) we can always get better at what we do, and 2) the internal and external factors that influence our work are frequently changing necessitating “improvements” to adapt to these changes.

The Drinking Water Program management team recently decided a program organizational restructuring was needed to ensure continuous improvement. The Drinking Water Program is now structured with three teams: Engineering and Water Resources, Data Management and Program Support, and Public Water System Inspection. All water systems were sent a letter in mid-May highlighting a portion of the changes. Most water systems will see changes in the following two areas:

1. Compliance contacts: All water systems have previously had two principal points of contact at the Drinking Water Program – a compliance officer and a field inspector. Under the new structure, each water system now has a single point of contact – a public water system inspector. The public water system inspector will serve as the primary point of contact for your water system for all direct compliance related activities including regular inspections (sanitary surveys), notices of non-compliance, sampling frequency changes, treatment requirements, on-site technical assistance, and emergency response. Under this new structure, if you have a compliance or regulatory question, your public water system inspector will be the person you contact at the Drinking Water Program. Pages 4 and 5 of this publication illustrate the newly formed districts and the public water system inspector assigned for each district.

2. Drinking water state revolving fund (DWSRF): Under the previous structure, your field inspector managed your DWSRF project. Under the new structure your DWSRF project will be managed by an engineer in a newly formed engineering section. Your public water system inspector will not generally be involved in DWSRF projects. The table on the next page provides a general breakdown of the duties of the three new teams in the Drinking Water Program. Additional information about the reorganization is also available on the Drinking Water Program website (www.medwp.com).

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Continued from 'Director's Corner'...

Engineering and Water Resources Team	Data Management and Program Support Team	Public Water System Inspection Team
Drinking Water State Revolving Fund Project Management	Administration of Data Systems and Other Information Technology Support	Sanitary Surveys and All Other Compliance Inspections (Watershed, Treatment, etc.)
Review and Approval of Plans and Specifications for Water Systems Improvements	SDWA Rule Management/Compliance Determinations	Lead Point of Contact with Public Water Systems, All Compliance Related Issues – Including Signing All Notices of Non-Compliance
Source Water Protection	Clerical Support and Records Management	On-site Technical Assistance
Subsurface Wastewater Management, Technical Oversight and Inspection	Board/Commission and Professional Licensing Clerical Support	PWS Operator Compliance Determinations
Public Water System Grants	Sample and Monthly Operating Report Data Entry/Transfer	New System Approval Project Management
Public Water System Training and Outreach	Correspondence with Laboratories	Sample Collection – When Needed
PWS Engineering and Technical Assistance – (Generally at the Request of the PWS Inspector)	Financial Management Support	Collection of Information at Public Water Systems
Board/Commission Technical Support	Laboratory Certification	PWS Regulation/Deregulation Determinations
Hydrogeological Reviews	Program QA/QC	PWS Security/Emergency Response
Website Design (Content Management)	Website Maintenance	General Operations Permits

These changes will better enable the Drinking Water Program to continue supporting you and your public water system as you strive to reliably providing safe drinking water to your customers. Please feel free to provide me you feedback on these changes.

Yours for safe drinking water,

Roger



L to R: Norm Lamie, Roger Crouse, and Carlton Gardner celebrate Norm and Carlton's retirement.

Drinking Water Program Retirements

Norm Lamie, Assistant Director and Chief Engineer, and Carlton Gardner, Compliance and Enforcement Team Leader, both recently retired from the Drinking Water Program. A celebration was held for both Norm and Carlton last month. Congratulations and happy retirement to both!

Service Connection

The Maine Drinking Water Program Newsletter

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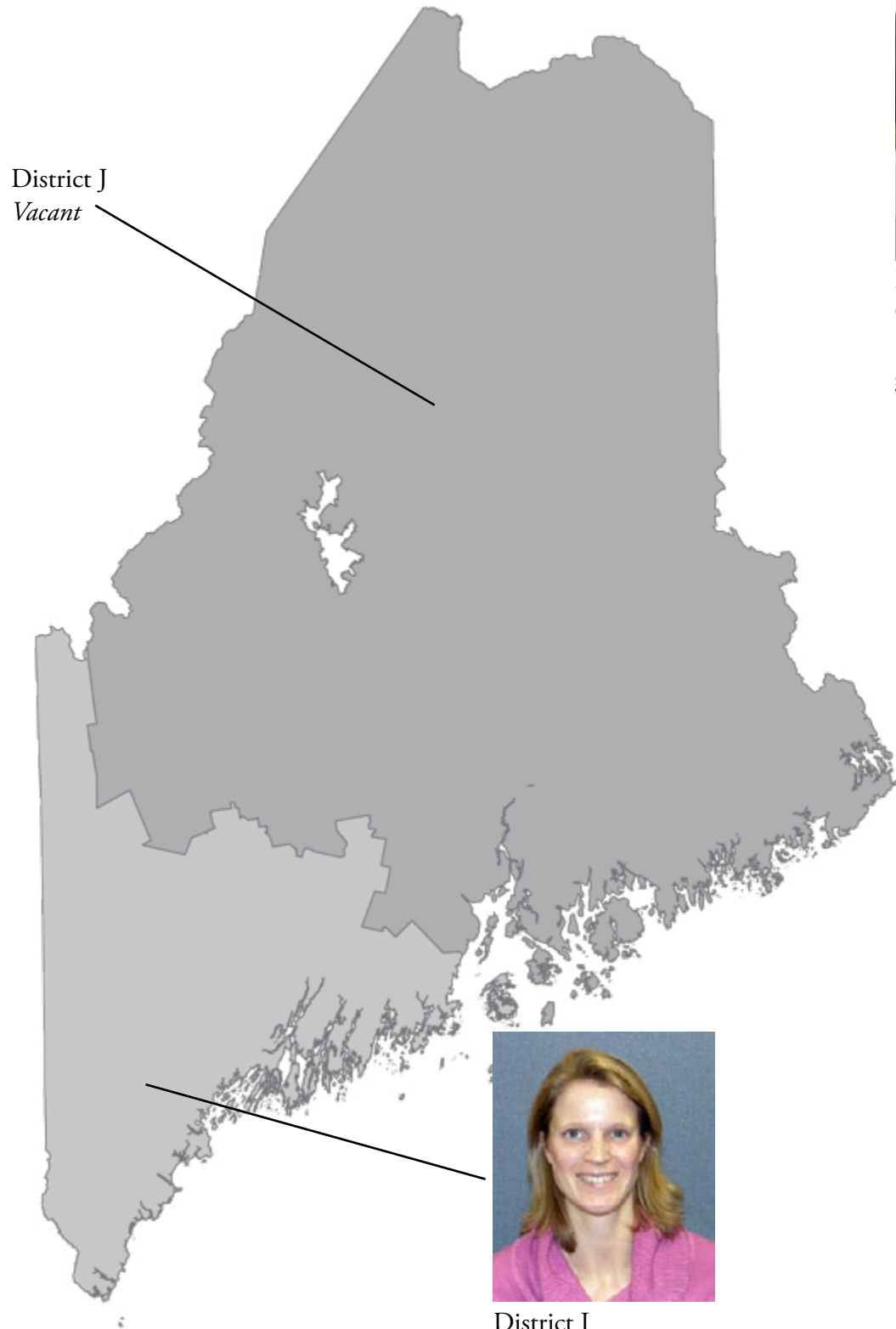
Drinking Water Program Reorganization: Public Water System Inspector Districts

Municipal Public Water Systems

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Non-Municipal Public Water Systems

All other water systems



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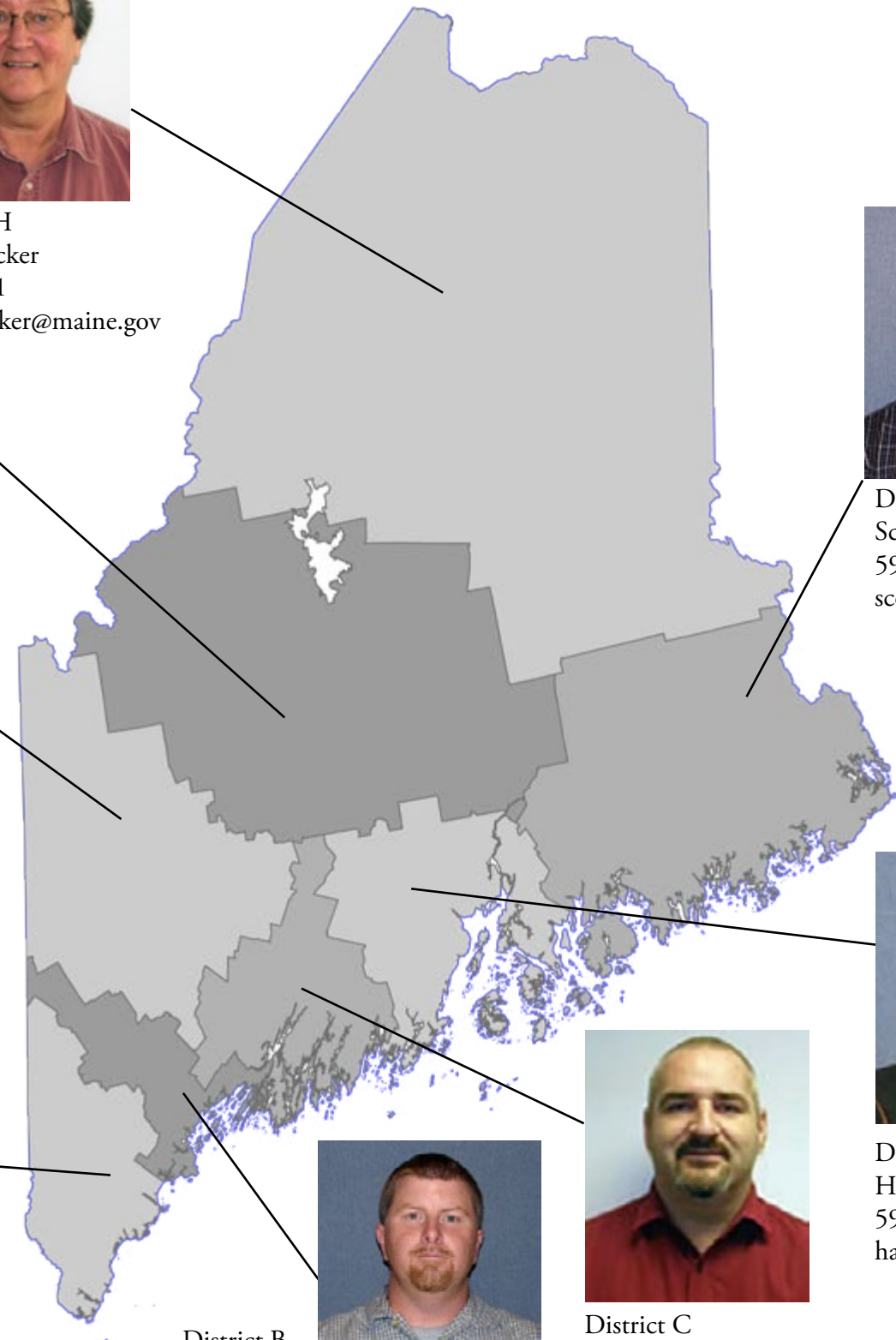
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Water Operator News and Reminders

Teresa Trott, Licensing Officer



Training Course Approval

The Drinking Water Program reorganization has many of us changing the hats we wear and the tasks we perform. Water operator Licensing tasks are among those changes. Training course approval

will now be processed by Julia Kimball, the Board Clerk, with the established relevancy guidelines in Board Rules. Relevant training topics will:

- have an influence on water quality, water supply or public health protection; and
- be directly related to the operation or maintenance of a water system; or
- be directly related to managing the operation or maintenance of a water system.

Funding is available through the Training Reimbursement

Fund for the provision of relevant training. Courses must meet selected capacity development topics and be pre-approved. For more info see the training page of the Water Operators Board section under “Professionals” on the DWP website at www.medwp.com. Training providers, water systems and individuals may apply for training approval by contacting Julia Kimball: email julia.kimball@maine.gov or phone 287-5699.

Available Training

EPA funded courses will be coming to Maine. These are free and will be advertised directly from a provider: EFCN, RCAP or MRWA. All courses (free or otherwise) will be posted on the DWP’s online training calendar, available at www.medwp.com. If you are unsure if a course is approved, contact Julia.

Board News

The Board now has the assistance of additional DWP staff to assist in investigating complaints filed with the Board against licensed operators. Jim Jacobsen will perform many of the complaint investigation steps. Jim has experience in investigating complaints concerning subsurface wastewater issues and holds both wastewater and water operator licenses.

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Water Quality Parameters

Several water quality parameters play a role in the corrosivity of drinking water. Should your public water system experience a lead and/or copper action level exceedance, the Drinking Water Program will request measurements of total alkalinity, calcium, conductivity, pH, and temperature at both the entry point to distribution system and within the distribution system. Your system may also be required to monitor for calcium carbonate, silicate, or other corrosion inhibitors, depending on the corrosion control technology your system employs to reduce the corrosivity of water in your public water system. By reviewing this data, the Drinking Water Program can work with your system to establish optimized water quality parameters to expedite a return to compliance with the lead and copper rule. For all systems using chemical addition to return to compliance with the lead and copper rule, a minimum pH of 7.0 is required in all samples unless the Drinking Water Program determines that meeting a pH of 7.0 is not technologically feasible or is not necessary for the water system to optimize corrosion control. If you are unsure of what pH minimums or water quality parameter ranges you must maintain, please contact your public water system inspector for guidance.

Monthly Operating Reports

All public water systems that add a chemical(s) to their water must submit a Monthly Operating Report (MOR) to the Drinking Water Program no later than the 10th day of the following month. For small and medium systems with corrosion control, you will be submitting MOR-13 at a minimum. Please ensure that you include pH readings collected no less frequently than every two weeks, the type and amount of all chemical addition(s), and the target water quality parameter range(s). Should you have a corrosion control treatment failure, please contact the Drinking Water Program as soon as you become aware of the problem. Waiting until a corrosion control failure is discovered on your monthly operating report may result in a treatment technique violation; being outside of your assigned range(s) for more than nine days in any six-month period is a violation of the corrosion control treatment requirements of the lead and copper rule.

Revised Total Coliform Rule- FAQs

Erika Bonenfant, Education and Outreach Coordinator

We have received several questions since the Revised Total Coliform Rule (RTCR) went into effect on April 1, 2016. The following questions are some of the more frequent we receive. If you have a question or concern that is not addressed here, please contact your public water system inspector.

1) I am a seasonal water system, am I required to take an O&M bacteria sample before I open?

If you are completing a startup plan that differs from the DWP's pre-approved startup procedure and your startup plan does not include disinfection of your water system, you will be required to take an O&M bacteria sample before you open and have those results available upon request from your public water system inspector. If you are a seasonal water system and you follow the drinking water program's "pre approved" startup procedure you are not required to take an O&M bacteria sample (also called operations and maintenance), although it is recommended that you do.

2) What happens now if I get a positive bacteria sample result?

Under the RTCR, if your water system experiences a positive bacteria sample result, you will be required to take three repeat samples. If any of those repeat samples are also positive for total coliform, your water system will be required to complete a Level 1 Assessment, to help identify the cause of the positive bacteria sample(s). Any deficiencies found during the Level 1 Assessment must be corrected within the identified timeframe. Additionally, if your water system is on a quarterly monitoring frequency for bacteria, you will be required to take three total coliform bacteria samples the next month. Of those, any samples testing positive for coliform will necessitate three more repeat samples. If your water system is on a monthly bacteria monitoring frequency, you will be required to take your usual monthly bacteria sample the next month. Again, depending on the results of that bacteria sample, additional sampling may need to be done.

3) Is my total coliform bacteria monitoring frequency going to change?

It depends. Some public water systems with a quarterly total coliform monitoring schedule may now be faced with the possibility of changing to monthly total coliform monitoring. The reason for this potential change is because the RTCR sets the default monitoring frequency for certain water system types as monthly for total coliform bacteria. Those water systems include seasonal and community water systems. If your water system falls into either of these categories, and you are currently on quarterly monitoring, then your total coliform monitoring frequency may change. An evaluation at your next sanitary survey will determine if a change is required. There are certain criteria to enable these types of water systems to maintain a quarterly total coliform monitoring frequency. These criteria include the following:

- ✓ Approved sample site plan with identified optimal time for monitoring
- ✓ Clean compliance history for total coliform over the last 12 months
- ✓ Free from sanitary defects or have an approved corrective action plan
- ✓ A completed sanitary survey or Level 2 Assessment within the last 12 months
- ✓ Protected source (a source with no microbiological sources of contamination within 300 feet *and* has one of the following: An active, up-to-date source water protection plan or own the entire source water protection area, or have a legal ordinance in place to protect the source)

It is also important to note that sampling frequency for *any* water system currently on quarterly monitoring for bacteria may change if the water system fails to meet the compliance requirements of the RTCR or no longer has a licensed water operator when required.



Paul R. LePage, Governor

Mary C. Mayhew, Commissioner

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