

Water Tap

Washington's Drinking Water Newsletter

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EPA's National Call to Action on Drinking Water

The U.S. Environmental Protection Agency's *Drinking Water Action Plan* urges all levels of government, utilities, community organizations, and the public to work together to increase the safety and reliability of drinking water. The plan, released in late November, includes six priority areas and defines proposed actions for each:

Build capacity for water infrastructure financing and management in disadvantaged, small, and environmental justice communities: Actions include launching a national initiative to promote regional partnerships, reinvigorating training programs for system operators, sharing best practices, and establishing an online water funding portal.

Advance oversight of the Safe Drinking Water Act: Actions include electronic reporting for Safe Drinking Water Act compliance data, releasing triennial EPA reviews of state programs, and developing indicators to identify troubled systems.

Strengthen source water protection and resilience of drinking water supplies: Actions include updating and acting on source water vulnerability assessments, building collaborative local partnerships for watershed protection, developing an initiative to enhance community resilience to climate and extreme weather events,

launching source water monitoring pilot projects and promoting water efficiency and reuse.

Address unregulated contaminants: Actions include strengthening the effectiveness of the health advisory program, prioritizing work on contaminants that pose the most significant risk, and promoting the development of low-cost and innovative technologies that may remove a broad range of contaminants.

Improve transparency, public education, and risk communication on drinking water safety: Actions include strengthening transparency and public education, developing indicators to enhance how data is presented on the Internet and improving risk communication tools.

Reduce lead risks: Actions include the consideration of critical options in revising the Lead and Copper Rule and continuing work to improve implementation of the current rule through enhanced oversight, identifying best practices on lead service line replacement, and revising guidance for schools.

While America's drinking water remains among the safest in the world, the drinking water sector faces a growing array of challenges including aging infrastructure, limited funding and management capacity, emerging contaminants, pollution of source water, and climate change. These challenges

can be particularly acute in small and disadvantaged communities.

While the change in EPA administration will undoubtedly come with changes in some priorities, many in the water industry believe the nation's safe drinking water programs are likely to be one area with relative continuity.

The proposals in this plan will undoubtedly precipitate healthy conversations on priorities and resources across the drinking water community. Ultimately, this plan represents an opportunity to increase public awareness of the value of the nation's drinking water and the importance of continued investment in our water infrastructure and Safe Drinking Water Act programs.

For more information on the plan, visit epa.gov and search for "drinking water action plan."

*Image: Diablo Lake on the Skagit River.
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"This plan represents an opportunity to increase the public's awareness of the value of the nation's drinking water."

Director's Column

Garin Schrieve, Director, Office of Drinking Water

Happy New Year! A lot has happened in the world of drinking water since our last issue of *Water Tap*:

- ◆ The Department of Health provided recommendations to Governor Inslee on ways to reduce children's exposure to lead in response to his May 2016 executive order.
- ◆ The State Supreme Court handed down a water rights decision ("Hirst Decision") that created new energy and interest in making changes to state water law.
- ◆ The U.S. Environmental Protection Agency (EPA) published its *Drinking Water Action Plan*, billed as a national call-to-action to address the public concerns sparked by the events in Flint, Michigan. EPA also finalized the Fourth Unregulated Contaminant Monitoring Rule. This rule identifies the emerging

contaminants that will be evaluated in the next wave of monitoring.

Oh, and we had a national election that represented a major ideological shift in the role of the federal government in health and environmental protection.

There will be a lot to watch in the coming year. We'll be closely following developments in the other Washington, looking for clues as to how the change in administration will impact our work to support safe and reliable drinking water. We'll also be tracking developments in our own Legislature and working to ensure that policymakers have access to the information they need as they make tough decisions that impact budgets, infrastructure funding, and public health protection.

Despite this evolving landscape, I'm confident that our nation and state will prioritize our industry's work to support



ODW Director Garin Schrieve

safe and reliable drinking water. I have yet to meet a single person who doesn't believe in the importance of safe water to support healthy communities and a healthy economy. I look forward to working with you in the year ahead to support this important mission!

A handwritten signature in blue ink, appearing to read "Garin Schrieve".

-GarinSchrieve

Workforce Issues: Avoiding the Gray Tsunami!

For several years, we have enjoyed talking with you at conferences about workforce issues and succession planning. You have given us some great ideas to share with utilities and regulators that want to avoid or address unnecessary challenges.

Recently you've been telling us about your strategies to avoid the "Gray Tsunami" coming our way as baby boomers retire; and we've put some of your ideas to work. For example, we expanded the operator in-training employment option to encourage operators to reach higher levels of certification and to help employers develop more robust candidate pools.

The challenge of finding qualified workers in a declining workforce goes well beyond our state or our nation; it is a major topic worldwide. While taking "working vacations," sponsored by the U.S. State Department's Agency for International Development,

Chris McCord, manager of our Operator Certification and Training Section, is helping to develop a training and test-based certification program in Albania.

During a recent visit to Albania, McCord participated in a panel discussion called "Addressing the Water Sector Workforce Gap: An Avoidable Crisis," where he shared some of your ideas about retention and succession planning. For example, he said utilities that practice capacity building through asset management acknowledge their most important asset is their workforce of managers and operators.



OpCert manager Chris McCord (right) speaking at a conference in Albania on workforce issues.

Keep the Ideas Coming

Look for more opportunities this year to discuss your workforce efforts and concerns with each other and with us. Please don't be shy. It's up to us to work together to develop outreach materials and opportunities to attract recent college and high school graduates, transitioning veterans, and others.

CCS is Not a Four-Letter Word

Recent sanitary survey data indicates that many public water systems aren't complying with the rules that require them to designate a cross-connection control specialist (CCS) in-responsible-charge-of their cross-connection control program (WAC 246-290-490 and WAC 246-292-050).

Because of the value we place on the CCS, we plan to begin tracking this mandatory position for each Group A public water system. We'll

phase in implementation of this existing requirement over the next few years to minimize the impact on small water systems.

Among many other responsibilities, the CCS develops and implements a water system's cross-connection control program. Ultimately, this mandatory position protects the distribution system and ensures that the system delivers the highest quality water to customers. You can find an outline of other duties in WAC 246-292-033.

Your system can meet the CCS requirement by signing an agreement with a contract CCS or a satellite management agency that offers CCS services, or having your existing waterworks operator earn a CCS certification.

There are several advantages to having your existing waterworks operator earn a CCS certification:

- ◆ Your system liability goes down when you meet your CCS requirements.
- ◆ Your system operator is likely already eligible to

take the CCS certification exam.

- ◆ 2017 is the second year of the three-year professional growth cycle, and passing the CCS certification exam will meet the professional growth requirement.
- ◆ No need to search for the right person for your system—you already have them on hand.

Questions? Please call the Operator Certification and Training Section at 1-800-525-2536 or email dwop-cert@doh.wa.gov.

Consumer Confidence Reports: Tell YOUR Story

If you own or operate a community water system, your consumer confidence report (CCR) is an opportunity to help your customers understand the value of the water you provide to them, to display the good work going on at your water system, and to show customers how their rates are put to good use to ensure they have safe and reliable drinking water now and into the future.

In light of the highly publicized challenges drinking water faced last year, it's especially important to reach out to customers in 2017. Fortunately, when we explain the work we do, we can build customer confidence while at the same time meeting the basic requirements of the CCR Rule.

"Consumers have relatively little information on drinking water quality or related risks and operational challenges," says EPA's new *Drinking Water Action Plan*. "People need more than just data; they also need better commu-

"People need more than just data; they also need better communication about the context and meaning of drinking water information."

nication about the context and meaning of drinking water information." Among other actions, EPA proposes to conduct an evaluation of the effectiveness of the required consumer confidence reports. See our story about the action plan on page 1.

Ways to Make Your CCR Shine

Talk to your customers in a user-friendly format with white space to make it easier on the eyes.

Use your CCR to help meet your water use efficiency reporting requirements. Both reports are due on the same day! Simply discuss the progress you've made to prevent water loss and tell your customers how they can help you achieve your water conservation goals.

Showcase improvements you've made or plan to make.

Advise customers about cross connections, what they are, and how to avoid creating them.

Common Mistakes to Avoid

- ◆ Failing to include all the mandatory language, such as the required language about lead in water.
- ◆ Providing water test-result lab slips instead of a data table, or omitting the water quality information all together.
- ◆ Failing to include all the data that represents the water you provided in the past year. Many water systems include only samples from the prior year. Instead, they should include results of the most recent less-frequently collected tests, such as lead and copper and disinfection by-products. The CCR rule requires you to report detections going back five years, unless you took and report a more recent sample.

Remember to submit your 2016 CCR to us by July 1, 2017. Your *Consumer Confidence Report Certification Report Form* (331-203) is due October 1, 2017, but most systems send it to us with their CCR. You can email the report and the certification to our Eastern Regional Office at ERO.ccr@doh.wa.gov, our Northwest Office at NWRO.ccr@doh.wa.gov, and our Southwest Office at SWRO.ccr@doh.wa.gov.

Drinking Water State Revolving Fund (DWSRF) Update

Construction Loans

During our annual construction loan application cycle, August 1 to September 30, we received 34 applications requesting a total of about \$58 million. We have about \$35 million available for construction loan projects. Although that's less than usual, we anticipate having more funds available in the future.

Loan repayments form the main revenue stream for the construction loan fund, and we have 104 projects still in the process of going to construction or under construction. These open loans represent about \$190 million that borrowers eventually will repay to the program. As these open construction loans close out and the repayments begin, we will have more money available for future construction loan cycles.

Mark Your Calendars

Upcoming 2017 DWSRF funding application cycles:

◆ January 2 to February 28:

Preconstruction and Consolidation Grants

◆ May 1 to June 30:

Preconstruction Loan

◆ October 2 to November 30:

Construction Loan

As each funding cycle approaches, we post information at www.doh.wa.gov/DWSRF. If you have questions, contact the DWSRF staff at 360-236-3107 or dwsrf@doh.wa.gov.

Additional Funding for Construction

This year we implemented a new process to assist DWSRF construction loan recipients that find themselves in need of additional funding for construction. We can award up to \$300,000 more per project if loan recipients provide the following:

- ◆ Copy of bids tabs.
- ◆ Identify the contractor awarded the bid for construction work and the final negotiated contract amount.
- ◆ Explanation why the bids exceeded the funding amount.
- ◆ Amount needed to complete construction. The additional funds can't cause the total loan amount



New membrane plant under construction in Port Townsend. Photo courtesy Janet Cherry.

to exceed the allowed funding limit established at the time of contract execution. For example, the 2016 construction loan application cycle limited the award to \$3 million. If needed, the additional funding (maximum of \$300,000) plus the initial award at time of contract execution cannot exceed \$3 million.

- ◆ We will not accept scope changes; you need to stay within the most current scope of work we have on file.

We process requests for additional funding on a first-come basis. To date, we allocated \$1.5 million annually to accommodate these requests.

Satellite Management Agency Program Update

The Office of Drinking Water (ODW) is energizing its Satellite Management Agency (SMA) Program. Approved SMAs are entities we authorized to own or manage and operate public water systems. Washington drinking water rules require an SMA to own or operate all Group A and B public water systems approved during and after 1995 in perpetuity, unless no SMA is available.

We began our updates in January 2016, by asking all approved SMAs to notify us when their contract with a water system is dropped. If the water

system was created after 1995, when the SMA Rule went into effect, we advise the system that it must find another SMA within 30 days to remain in compliance. We also notify the local health jurisdiction.

Although this compliance strategy resulted in a significant compliance rate, we realize there is always room for improvement. We're working to further develop our communication with water systems and SMAs.

We also started an ODW workgroup and an external advisory committee to address two goals: to ensure that

SMA customers receive excellent service and safe and reliable drinking water, and to ensure that we support approved SMAs. Current areas of focus include defining the roles and responsibilities of SMAs, to raise the standard level of service, and to create a publication for Group B water systems that communicates the value of contracting with an SMA.

We will continue to invest in the SMA program in 2017, and work to empower communities to care for their investments through strong, viable utilities that demonstrate long-term capacity.



Ready or Not, the New Group A Rule is Here!

The State Board of Health adopted proposed changes to the Group A Public Water Supplies Rule (WAC 246-290). The new rule, effective January 14, 2017, affects the Revised Total Coliform Rule, water system planning, disinfection, and emergency sources and supplies.

Revised Total Coliform Rule: The new rule incorporates the federal RTCR. It requires all water systems to collect three repeat samples for every total coliform positive sample. The rule also requires systems to conduct a Level 1 or 2 assessment to “find and fix” any sanitary defect when a treatment technique trigger occurs. A Level 1 assessment is a basic evaluation an owner or operator can do. Level 2 is a more complex assessment only a person with state-required qualifications can do. It updates the coliform monitoring plan requirements, including sample sites and sampling schedule, monitoring locations and frequency, and criteria for sites and numbers of routine and repeat samples.

Water System Planning: The new rule revises the timeframe for water systems to submit an updated water system plan from 6 years to 10 years with flexibility to submit sooner if needed. It also replaces the term, “expanding system” as a plan submittal trigger with three

specific options: 1) Increase or modify the service area identified in an approved planning document; 2) Increase or modify the geographical area where service is provided if a planning document was not previously approved; or 3) Install additions, extensions, or changes to existing infrastructure and asking us to increase the approved number of service connections.

Emergency Sources: The new rule provides two options for systems that have an emergency source (emergency interties excluded). One, water systems must physically disconnect emergency water sources and obtain our permission prior to use. Two, they can physically connect the emergency source to the distribution system if they meet three conditions: First, it must be a drilled and cased well. Second it must be physically isolated from the distribution system (isolation valve is normally closed and motor is normally electrically locked out). Third, the system’s approved emergency response plan must address source maintenance and exercise, background water quality, routine periodic sampling, start-up and public notice protocol, and engineering or design approval status.

Trucked Water: The new rule converts long-standing guidance into rule. It makes the water system receiving the

emergency trucked-water supply responsible for the safety of the water provided to the public. It must get prior permission to use trucked water from the local or state health officer or emergency management agency, ensure the supply comes from an approved Group A source, ensure adequate disinfectant residual during transport and upon delivery, and maintain records associated with trucked water operations.

Disinfection: The new rule clarifies existing requirements for disinfection and aligns with new requirements under the RTCR. It:

- ◆ Clarifies the triggers for continuous source disinfection (CT6) and distribution residuals.
- ◆ Provides flexibility in monitoring and reporting requirements.
- ◆ Sets new requirements for systems that use reverse osmosis to desalinate seawater.
- ◆ Clarifies the criteria for treatment techniques and reporting violations.
- ◆ Adds a new definition for “detectable residual disinfectant concentration.”
- ◆ Requires groundwater systems that must provide CT6 source disinfection to use an EPA-approved method, such as a digital colorimeter, to measure free chlorine residual. CT6 systems may no longer use color wheels or test strips.



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Water Tap Congratulates Eastsound Water

Eastsound Water on Orcas Island set a new water use efficiency record in 2016, but the community won't stop there. Earlier this month, 50 residents and business owners spent 12 hours developing a new vision statement for the water system. The concept of *sustainability* and the idea that the island has limited natural resources drove the group's work, and the resulting vision.

During the last 16 years, their customer base grew by 47 percent from 833 equivalent residential units (ERUs) in 2000, to 1,228 ERUs in 2016. Over this same period, total annual production *declined* by 31 percent.

One way to measure water system efficiency is gallons produced for each ERU. This is where Eastsound Water hit a new low of 47,720 gallons per ERU in 2016, down from a peak of 85,700 in 2001. That's a 55.6 percent improvement.

General Manager Paul Kamin says several initiatives contributed to this success. Most important of these is the staff's commitment to attack every water main leak as they

discover it. Over the last 10 years, they replaced 12,000 feet of their worst water mains.

Eastsound gives customers incentives to fix leaks on their property through attention-getting \$20 per 1,000-gallon surplus water fees, and liberal relief for high water bills due to leaks if the customer replaces the entire outdated service line instead of patching a leak. They also installed an automated water metering system that reports hourly water use daily. Customers can access their water use history online, and the system can alert customers if their service experiences 24 hours of continuous flow—identifying leaks in days instead of weeks or months.

The Eastsound community will continue to grow. The Eastsound Sub Area planning process now underway will determine how and at what rate. Eastsound Water will do its part to ensure that the water system and the water supply they depend on can support the evolving community.