

Safe Drinking Water Act Advisory Committee Meeting
Wednesday, September 3, 2008
MassDEP, One Winter Street, Boston

Attendance – Dave Terry, Yvette DePeiza, Denise Springborg, Paul Niman, Fred Barker, Ann Marie Allen, Michael Hutcheson, MassDEP; Jennifer Pederson, Mass. Water Works Association; Carol Harris, MWWA/Woodard & Curran; Barry Woods, Buzzards Bay Water District; Alan Cathcart, Concord Public Works; Michael Celona, MassDPH; Dino Eliadi, MWWA/Worcester Water; Ed Rondeau, Western Mass. Water Works Association; Becky Smith, Clean Water Action; Stephen Estes-Smargiassi, MWRA/NEWWA; Kevin Braga, ESS Laboratory/ITLA; Kevin Reilly, U.S. EPA

Minutes

I. Chemical Safety Control Strategy – Chapter 6 of Guidelines

Paul Niman described the Expert Panel that was formed to discuss controls/alarms for chemical feed equipment at public water systems. The ER Work Group has been meeting with the panel to discuss what suppliers can do to avoid impacts to public health if there is a chemical misfeed. The panel also discussed recommendations for analyzers, types of controls, data loggers, how to test alarms, remote notification devices, etc., and recommendations for a reasonable minimum level of protection for different sized systems. The recommendations of the committee have been incorporated into a draft Chemical Safety Control Strategy that will be contained in Chapter 6 of the *Guidelines for Public Water Systems*.

Comments from the committee: this is a good start; a dialogue was started early on and DEP should be credited with that approach; this is a good framework and presents good management practices; take time to make sure that chemical list is complete; allow 60 days for comments; do training; water suppliers will need time to obtain money through local budget process; possibly use a self-certification process.

Comments should be sent to Paul Niman. A final draft is expected this fall. The topic will be presented at MWWA's January meeting. Trainings will be held in the spring.

II. Development of Plan Review Checklist for Treatment Permits

Fred Barker presented a draft checklist titled *Water Supply Checklist for Potassium Hydroxide (KOH) or Sodium Hydroxide (NaOH) for Permit Review/Approval*. This checklist would be completed by a design engineer on behalf of a public water system. Other checklists will be developed for other treatment chemicals. Fred worked with an internal group to develop the form.

The purpose of the checklist is to have consistent information submitted for MassDEP reviews; save time and shorten the approval process; be a useful tool for design engineers; and standardize MassDEP approval across the regions. The checklist matches

components of Chapters 5 & 6 of the guidelines. There will be training prior to the implementation of the checklist.

Yvette DePeiza noted that it is the intent that all information collected on the checklist will be stored electronically; won't repeat questions in an approval letter; reduced existing 32 pages to eight pages; captures the information asked for in the guidelines; makes it easier to go through the review process; puts information in a usable form.

Comments from the committee: Is this like a self-certification process (yes); it's nice to have a list of what the reviewers are looking for; may draw more attention to the guidelines and make them more clear; get design engineer into the loop – may get useful comments; makes sense – can be used to plan budgets; do a test run with a designer; may minimize change orders and save time and money for suppliers; should run the checklist by a group of consultants; the checklist should provide timely review that will benefit everybody; include consultants in training session.

III. Ground Water Rule – Fecal Indicator

Denise Springborg described a draft tiered approach (see handout) as an option to select a fecal indicator for the Ground Water Rule. This is a follow up to the discussion at the last SDWAAC meeting.

Community PWS – with protection/influence zones greater than a specific area or radius (to be determined) – will use E. coli or enterococci as an indicator depending upon the presence, or not, of E.coli in the distribution system.

Community PWS – with protection/influence zones less than a specific area or radius (to be determined) – these systems will use E. coli as the fecal indicator.

Non-transient and transient non-community PWS – these systems will use E. coli as the fecal indicator.

Comments from the committee: enterococci may be naturally present – avoid inadvertent triggering of violations; default is to test for E. coli except at large systems with total coliform in their system? (yes, these systems must test for enterococci); it should be emphasized that the correct box needs to be checked on the lab forms to avoid confusion; what about communities with multiple wells & what's a big Zone II? (issues need to be worked out); EPA representative likes the approach – “small systems like E. coli – large systems like enterococci (it better captures pulses of contamination over 12 months)”; it would be easier to use a certain sized system rather than depend on the size of a Zone II; it would be easier to use a term, like population served, that suppliers are used to; use population served as this is tied into amount pumped; a tiered system is good.

In response to a question about certification, a WES representation stated that a proficiency test will be developed to certify labs for enterococci presence/absence once MassDEP determines an approach. It may take three to four months to get labs certified.

IV. Ground Water Rule – Update

Denise Springborg gave an update on work to implement the Ground Water Rule including requirements for raw water sample taps and emergency disinfection injection ports. MassDEP will implement the requirements of the Ground Water Rule to protect public health until the final state regulation is adopted.

Conclusion

Dave Terry concluded the meeting by thanking the members for their insightful and helpful comments.