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Division of Environmental Health
Drinking Water Program
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Important Information

For Water System Operators and Owners

Northern Flows

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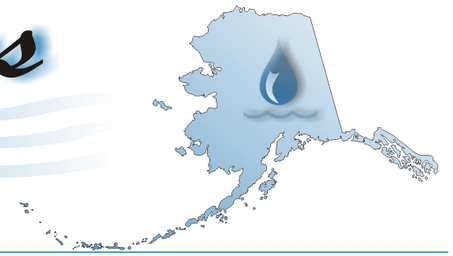
Northern Flows



Alaska's Drinking Water Program Newsletter
Issue 30 • Summer 2007

Message from the Manager

Summer is here. It seemed as though our spring was going to last forever; and what an unusual spring we had. Overall, very dry and overall very cool temperatures, especially in South-central Alaska. As water professionals, whether drinking water or wastewater, we are busy at this time of the year working on, or with, our system and our customers. Some of us may be planning our "fun stuff" summer activities; however, now is a very good time to be proactive and get your annual monitoring done early, and if your sanitary survey is due this year, now is the time to schedule your survey. If you're a public water system (PWS) owner, or the operator, now would be a good time to review your annual compliance monitoring schedule for your system. This is the schedule that was sent to you from your local Department of Environmental Conservation (DEC) Drinking Water Program staff. The sooner you get these requirements completed, the sooner you will be able to make allowances for the unexpected issues or events that always seem to happen. Also, the sooner you complete the requirements for your system, the sooner you can get to those "fun stuff" activities you have planned or are dreaming about. Think of it in this proactive manner: "work now, play later" rather than in a potentially reactive manner of "play now, pay later". As added incentive to "work now, play later" check the insert in this newsletter for the 2006 PWS Honor Roll. Is your water system on this list, and was your water system on the 2005 PWS Honor Roll? If not, now is a good time to start doing what you need to do so that your system can be on the 2007 PWS Honor Roll.

The first of the Drinking Water regulations, 18 AAC 80, revision projects planned for 2007 is in progress. This regulations project is focusing on revising Article 3 (Standards, Monitoring, Variances, and Exemptions) and Article 6 (Surface Water Treatment Rule). Additionally, the State of Alaska will replace its current classification of Class A and B systems with the federal nomenclature of Community Water System (CWS), Non-transient Non-community Water System (NTNCWS), and Transient Non-community Water System (TNCWS); and will change the "owner/operator" requirements to "owner" where appropriate. A Drinking Water regulations, 18 ACC 80, revision package planned for later this year will include clarification of the Class C State PWS classification section.

The Drinking Water Program continues to add new staff as a follow-up to our approved budget request from fiscal year 2007. Please welcome Daniel Weber, Regulations Specialist; Georgia Rand, Administrative Manager; Patrick Charles Palmer, Hydrologist in the Anchorage office and Luke Boles, Environmental Engineering Assistant in the Fairbanks office. Also, the Drinking Water Program has two college interns; Stephanie Plate in the Anchorage office and Chad Odom in the Fairbanks office, working in the engineering group for the summer. Our fiscal year 2008 budget request was approved, and starting July 1, 2007, we plan to add five additional staff to the Drinking Water Program. These positions will include: three Environmental Program Specialists I/II located in the Anchorage, Fairbanks, and Wasilla offices, an Analyst Programmer, and an engineering position located in any of the five Drinking Water Program offices. If you are interested in working in a positive and fulfilling work environment, as well as a dynamic and challenging public health regulatory program, check out Workplace Alaska recruitment notices during July and August as we post these DEC Drinking Water Program positions. All of these positions provide support and promote the program's focused goal of "public health protection through safe drinking water" Check for Workplace Alaska recruitment notices at: http://www.jobs.state.ak.us/ and click on "Workplace Alaska".

The Drinking Water Program's newsletter, *Northern Flows*, began with the Winter 1999 issue. We are in our

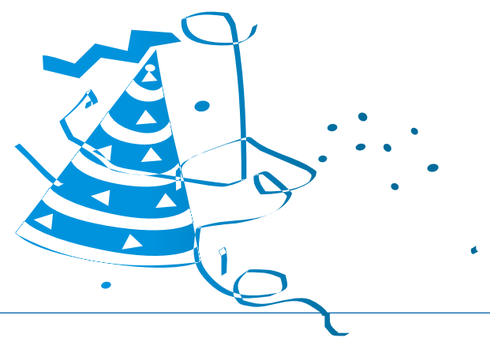
Continued on page 4

This Issue

Northern Flows IS Going ELECTRONIC

Yes, the *Northern Flows* is going Electronic. The first electronic issue will be the Fall of 2007 (Issue Number 31). If you want to be on the distribution list for the new "Electronic" *Northern Flows* please contact Georgia Rand. You may send her an email at georgia.rand@alaska.gov or call her at (907) 269-3068. If you don't sign up for the distribution list, you can still look at a copy by going to our website at:
http://www.dec.state.ak.us/eh/dw/publications/newsletters.html

We are going to the electronic format for our newsletter in an effort to reduce the programs cost in producing this resource. Please let us know your thoughts on this endeavor.



Enhanced Sanitary Survey Forms *by Kathy Kastens*

The Drinking Water Program has been working on revising our Sanitary Survey form for the past several years. We have been trying to convert from a paper survey to an electronic form and to add question sets to comply with the Interim Enhanced Surface Water Treatment Rule (IESWTR). EPA and the states (through the Association of State Drinking Water Administrators) issued a joint guidance on sanitary surveys entitled *EPA/State Joint Guidance on Sanitary Surveys*. The guidance outlines eight (8) elements as core components that the sanitary survey must address. Those elements are listed in the color shaded box.

Our initial attempt to convert over to the electronic version for our sanitary survey forms met with some difficulties. The original electronic version of the form didn't line up or link with our existing SDWIS (Safe Drinking Water Information System) Data Base. So, at this time last year we ended up with a survey form for Ground Water Systems "with no treatment", but we weren't ready for the other types of systems. Over the past nine (9) months we reviewed issues we found during beta testing of the original electronic form and made some changes. This field season we have "version two" of the new Electronic Enhanced Sanitary Survey form. It will be field tested on a variety of system types by both DEC DW Program Staff and DEC Certified Sanitary Survey Inspectors (or Third Party Surveyors). We are hoping the new form will be easier to use and incorporates all those questions required by the IESWTR. Some of the new questions will be on issues like whether or not your system has a written emergency response plan or has an alternate water source identified in case something were to happen to your source. There will also be questions about the management and operation of your system, such as whether or not you have a fee schedule and collections accounting or if you have a current budget.

Core Elements of a Sanitary Survey
- Source (Protection, Physical Components and Condition)
- Treatment
- Distribution System
- Finished Water Storage
- Pumps/Pump Facilities and Controls
- Monitoring/Reporting/Data Verification
- Water System Management/Operations
- Operator Compliance with State Requirements

The DW Program had an in-house training session for our staff in May 2007 and are ready to try out the new form and share it with Third Party Sanitary Survey Inspectors. After this field season we will again review what we learned from using the new form, and will incorporate improvements to the final form, "version three". By next field season we (hopefully) will be able to have a useful and easy to use Electronic Enhanced Sanitary Survey form in an electronic format. The DW Program is working diligently on consistency and accuracy for our PWS records, and the Electronic Enhanced Sanitary Survey is one of many ways that we will be trying to make sure that happens.

If you are a DEC-approved Third Party Sanitary Survey Inspector please contact your local DW Program staff that you usually work with for the information. If you are a PWS owner or operator please expect some changes to the questions that are asked during a sanitary survey.

The DW Program staff appreciates all the help and cooperation that we have received from inspectors and PWS owners and operators in testing this new way of doing business. Thank You. ~

What's New with Security for PWS cont'd. *by Shannon De Wandel*

the Tutorial and move to the Direct Mode to create the VA/ERP documents using the information they have already entered during the Tutorial session; or they may move from the Direct Mode to the Tutorial for more instruction. Users may easily move from one area of the program to another, and will also have the option of saving their work session at any time, in either the Tutorial or Direct mode, and then re-open the session at a later time.

Any system vulnerabilities identified during the VA process will be gathered and reported in the Gap Analysis output document. The end results after finishing the ERP CD will be a completed VA, ERP, a letter of request to receive continuing education credits (CEUs), and Gap Analysis documents for your PWS.

The DW Program is beta testing the ERP CD and will have a final version available for use sometime this fall. Assistance with these and other PWS emergency response or security issues is available by contacting Shannon DeWandel at (907)269-8924 or by email: Shannon.Dewandel@alaska.gov ~

Substantial Implementation for Protection Plans cont'd. *by Chris Miller*

Community Water Systems (CWS):

CWS must have a current Drinking Water Source Protection Plan endorsed by the State of Alaska and must implement at least two strategies of the plan.

OR

The community must have an active enforceable ordinance and agreement, or a program that explicitly addresses the protection of public drinking water sources.

Non-Community Water Systems:

Non-Transient Non-Community (NTNC) and Transient Non-Community (TNC) systems must complete a checklist provided by DEC listing strategies tailored to the types of potential contaminant sources identified in the system's protection area. When the checklist is endorsed by DEC, it becomes the system's Drinking Water Protection Plan.

So, what's the incentive for obtaining an endorsed Drinking Water Protection Plan? An effort is currently underway to incorporate endorsed Drinking Water Protection Plans into various waivers such as SOC/OOC Monitoring Waivers and Separation Distance Waivers, as well as qualification for grants and loan projects. In the short run, endorsed Drinking Water Protection Plans have the potential to immediately save systems money through monitoring waivers. Over the long-run, the community has an increased chance of maintaining affordable safe drinking water for future generation, and this which is priceless.

If your system or community is currently implementing efforts to protect drinking water sources, you may already qualify for a DEC endorsed Drinking Water Protection Plan. Please contact Chris Miller or Charley Palmer of the Drinking Water Program to determine if you or your community qualifies for an endorsed Drinking Water Protection Plan. For further information and examples of endorsed Drinking Water Protection Plans please go to our website: →

Http://www.dec.state.ak.us/eh/dw/DWP/source_water.html

At the Spring AWWMA Conference Awards Ceremony, The Small Water Systems Operator of the Year Award went to Patrick Smith, Minto Traditional Council. Congratulations Patrick!

40-30 Certification, Do You Qualify? *by Heather Newman*

Have your sample results for Total Trihalomethanes (TTHMs) and Haloacetic Acids (HAA5) been below 0.040 mg/L and 0.030 mg/L, respectively? Has your system had no TTHM and HAA5 monitoring violations under the Stage 1 Disinfectants and Disinfection By-Products Rule during an 8 consecutive calendar quarter timeframe beginning no earlier than January 2005? Is your system a Community Water System serving up to 49,999 people or a Non-Transient Non-Community Water System serving at least 10,000 people? If so, then your system may qualify for 40/30 certification and may NOT be required to submit an Initial Distribution System Evaluation (IDSE). To certify your system meets these requirements, fill out the Certification Letter on our website. →

Mail in, the 40/30 Certification Letter, and a schematic of your distribution system to the address provided on the letter. The schematic should include:

- Entry points
- Sources
- Stage 1 TTHM and HAA5 monitoring locations

Schematics should not include information that poses a security risk to your system, such as the exact location of your well.

Deadlines for these certifications to be submitted are as follows:

Systems serving a population of 10,000 to 49,999: October 1, 2007.
Systems serving a population of less than 10,000 (Community water systems only): April 1, 2008.

The certification provided to EPA must be retained by the PWS for 10 years from the date it was submitted. The certification, all applicable data used for the certification and notification from the EPA and/or State of Alaska Department of Environmental Conservation Drinking Water Program (DWP) about the certification must be made available upon request by the EPA, the DWP, or the public. If you have any questions regarding the certification or whether you meet the criteria, please call your Environmental Program Specialist. ~

Http://www.dec.state.ak.us/eh/dw/publications/forms.html

Prince of Wales Island *by Carrie McMullen*

As part of a recent Technical Assistance Providers' group trip to Prince of Wales Island, I had the pleasure of participating in a public meeting in the community of Thorne Bay. Typically, not many people would consider attending a public meeting a pleasurable experience, but indeed this was not your average public meeting. As the Environmental Program Specialist with the DEC Drinking Water (DW) Program in Southeast Alaska, I traveled with Brandon LeBaron and Laren Kowallis, Circuit Riders from Alaska Rural Water Association; Phil Downing, Remote Maintenance Worker from Southeast Alaska Regional Health Consortium; Lawrence Blood, Local Government Specialist with the Rural Utility Business Advisor Program; and David Khan, DEC DW Program Engineer. We were invited by Thorne Bay's new City Administrator to come to the public meeting to discuss the community's concerns regarding ongoing high levels of disinfection by-products (DBPs) in the drinking water. Since sampling for the Stage 1 Disinfectants/Disinfection By-Products Rule began in 2005, Thorne Bay has consistently had results for both Total Trihalomethanes (TTHMs) and Haloacetic Acids (HAA5s) at levels three to four times the respective Maximum Contaminant Levels (MCLs). Community members, leaders and the Public Works staff are concerned about the potential health effects of the elevated DBP levels, as well as the Notice of Violation issued to the system for the DBP MCL exceedances. This particular meeting was scheduled to allow customers of the water system as well as local government officials an opportunity to ask questions about DBPs, potential treatment plant improvements or replacement, and utility management and finances.

Several factors combined to make this particular public meeting successful. The City staff mailed announcements to residents on several occasions, making every attempt to ensure that community members knew about the meeting. More than 30 people attended the meeting. It was immediately obvious they had done their own research and prepared questions for our group. The Public Works staff had already worked to identify areas of potential improvement on both the short and long terms and was prepared to begin making changes immediately. As a whole, the community was well educated about their issues, willing to accept the responsibility to address those issues, and ready to take whatever steps necessary to ensure that their water was safe to drink. As with most complex problems, there is no simple answer or easy fix for Thorne Bay's DBPs troubles. However, many excellent ideas were exchanged, useful information shared and a better understanding of the situation was gained by everyone at the meeting. Our group was able to answer questions about potential health effects of DPBs, different types of drinking water treatment methods available to consider, and financial aspects of maintaining a public water system. We also provided contact information for other state agency programs such as Village Safe Water and Epidemiology which may also be able to provide additional assistance.

As regulators, we must set aside our own emotions when working with public water systems on issues that are often times highly emotional. On this particular evening, I must admit that I became a bit emotional with an overwhelming sense of pride. Proud of the operator who is devoted to his job and community's well-being; proud of the citizens who have taken an interest in protecting the health of their community; and proud that our group of Technical Assistance Providers could be of assistance to Thorne Bay as they work to reach their goal of providing safe drinking water. This public meeting was a first step in what will likely be a long process, but with the community's commitment to following through, the Technical Assistance Providers will continue to work with Thorne Bay to achieve success. ~

Incident Command System Training *by Shannon De Wandel*

The incident Command System (ICS) is a standardized on-scene organizational structure that can scale to respond to any size of emergency. ICS is recommended for public works, and can be easily used by a public water system. At the public water system level, the Emergency Response Lead has the role of Incident Commander, unless the incident is of such significance that local, State, or Federal officials take over the command. At a minimum, you should be familiar with ICS terms and command structure. First responders may take over the role and responsibilities of Incident Commander in the latter stages of a major event, and you should know how this affects your role and responsibilities.

The Federal Emergency Management Agency (**FEMA**) recommends that the **minimum criteria for public works personnel** level of ICS training is **ICS 100, 200, and NIMS 700. A training webcast for ICS 100 and NIMS 700 will be offered for free on September 5-6, 2007.** Please contact Shannon DeWandel for further information at (907)269-8924 or by email: Shannon.Dewandel@alaska.gov ~

Message from the Manager cont'd. by James Weise

ninth year and this is our 30th issue. A former Drinking Water Program staff member, Joe Cottingham, was instrumental in getting the program to develop a newsletter to better inform water professionals on what the DEC Drinking Water Program was doing, what we planned to do in the future, and what PWS owners and operators wanted and needed to know, or better understand, to provide safe drinking water to their customers and achieve and maintain compliance with Safe Drinking Water Act Requirements. Sadly, this is our last hard copy of *Northern Flows*. To stay with the times and try to be more efficient and effective, as well as reduce program costs, we are going to an electronic newsletter starting with Issue 31, Fall 2007. This electronic newsletter will be quarterly and will be posted on the Drinking Water Program's website. A notice, called "Northern Flows E-News" will be sent to everyone on our distribution list letting them know the newsletter is posted on the Drinking Water Program's website. The "E-News" notice will contain a short summary of the major topics covered in the issue with active links to that particular topic in the newsletter. We hope you like this new format, it is an adventure for us to move in this direction. We welcome comments from you, our readers, on how to make the newsletter more informative and overall higher quality. If you want to be on the new *Northern Flows* distribution list, please contact us by either calling or emailing Georgia Rand. Her phone number is (907) 269-3068, and her email address is georgia.rand@alaska.gov

Have a great summer and enjoy!

James R. Weise

James Weise
Manager
Alaska Drinking Water Program

What's New with Security for PWS by Shannon De Wandel

One of the Drinking Water (DW) Program's goals is to develop tools, training and public outreach oriented towards enhancing a community's willingness to establish an effective and well practiced Emergency Response Plan (ERP). An ERP for every PWS gives the local community an advantage in maintaining public health protection through safe drinking water.

A while ago the DW Program developed the *Emergency Response Planning Toolkit for Alaska's Small and Rural Public Water Systems*. Using a federal grant, the DW Program contracted with a developer to prepare an ERP template and instructions customized for the smaller PWS's in Alaska. This product was further enhanced by preparing it to operate on a self-running computer program (a CD) to further encourage its use by PWS serving between 25 and 3,300 customers. DW Program staff continue to look for and test improved ERP activities and products used by other states and organizations to continue refining the tools we deliver to Alaska PWS owners and operators.

- The ERP CD will be able to guide you through the process of Emergency Response Planning for your public water system (PWS).

- The ERP CD will help you think through most potentially disruptive events. Most systems already have plans in place for dealing with minor incidents such as pump repairs, out-of-range sampling results, freezing temperatures, and other such events. But what would you do if there were an event such as a major earthquake?

- The ERP CD aids the PWS owner in developing a written ERP to follow in times of emergency. An ERP will help you and your staff during times of emergency, providing you with a basis for action. Knowing and practicing what to do during and after an emergency will lessen the time it takes your system to fix any problems, and will reduce the time it takes for the system to resume providing safe water to its customers.

- The ERP CD, when appropriately reviewed, provides Continuing Education Units (CEUs) credit. DEC requires all PWS operators to obtain continuing education credits between re-certification classes. Completing the Tutorial Mode of this CD will provide users CEU's, although the exact amount has yet to be determined.

The ERP CD application will launch when users insert the CD into their CD-ROM drive. An introduction to the CD will run automatically. From this screen users will have three options: 1) to begin the Tutorial Mode, 2) to begin creating a new Vulnerability (VA) and/or an ERP document in Direct Mode, or 3) to open a previously saved session or document for editing.

Using the Tutorial Mode will result in a completed quiz that can be submitted for CEU credits. The Direct Mode does not permit the user to obtain CEU credits, and is intended to allow users to edit existing documents or create new ones quickly.

Users will be moved through the Tutorial and VA/ERP document creation options in a logical sequence. They may decide at any time to leave

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Substantial Implementation for Drinking Water Protection Plans by Chris Miller

In an effort to determine the extent of drinking water protection efforts throughout the Unites States, the USEPA requires States to report annually the number of Drinking Water Protection Plans implemented for community water systems. EPA measures success of the Drinking Water Protection Programs by the number of community water systems that meet the State's definition of "Substantial Implementation".

Over the last year, Alaska's Drinking Water Protection Advisory Council has redefined "Substantial Implementation" and DEC Drinking Water Protection Program staff are working towards identifying public water systems that meet the new definition. It's hoped that the new definition will lead to endorsed Drinking Water Protection Plans that recognize communities taking steps towards protecting their source(s) of drinking water. In order for Public Water Systems to be recognized as having an endorsed Drinking Water Protection Plan, they must meet the following requirements:

Continued on page 12

Regulations Corner - PWS Records Retention by Daniel Weber

The Code of Federal Regulations (CFRs) for drinking water regulations effective in Alaska require owners and operators of public water systems (PWS) to maintain a variety of records for stated periods of time. Which records must be kept, and how long they must be kept, depends on which regulations your system is subject to.

All public water systems (15 service connections, or regularly serves at least 25 people for 60 days out of the year) have to maintain the following records on their premises:
- Microbiological analyses and turbidity analyses must be kept for **5 years**. You can keep the actual lab reports or you can transfer the data to a tabular summary.
- Chemical analyses must be kept for **10 years**. The data from these analyses may be transferred to a summary table, as described above for microbiological and turbidity tests.
- Reports, summaries and communications concerning a sanitary survey must be kept for **10 years**.
- If you take action to correct a violation of a primary drinking water regulation, you're required to keep documentation of the corrective action for **3 years** after completion of the last action taken with respect to a particular violation.
- If you are issued a notice of a violation for a primary drinking water regulation, you must keep a copy of the notice for **3 years**.
- Records of a variance or exemption granted to your system must be retained for **5 years** after the expiration of the variance or exemption.
- If you have a monitoring plan in place, you must keep a copy of the plan itself for as long as you are required to keep records of any analyses performed required by the plan. For example, if your monitoring plan includes chemical monitoring, you must retain a copy of the plan for 10 years after the last chemical analysis done under the plan.

If your PWS is also a community water system (15 service connections used by year-round residents, or regularly serves at least 25 year-round residents), you're required to issue an annual Consumer Confidence Report. You must keep a copy of each CCR for **3 years** after it is issued.

Community water systems and non-transient, non-community water systems (regularly serves at least 25 of the same persons over 6 months per year) are subject to the Lead and Copper Rule. The EPA record retention requirement on this subject is quite broad. It requires owners and operators of such systems to keep for **12 years** "all sampling data and analyses, reports, surveys, letters, evaluations, schedules, State determinations, and other information" collected as required by the Lead and Copper Rule.

A PWS using a surface water or Ground Water Under the Direct Influence of Surface Water (GWUDISW) source and serving fewer than 10,000 people is subject to EPA's Enhanced Surface Water Treatment Rules (LT1and LT2). Specific requirements under these rules vary, depending on system characteristics. The record retention requirements for LT1 systems are:
- If you conduct continuous turbidity monitoring of individual filters, your monitoring results have to be retained for **3 years**.
- If you develop a disinfection profile for your system, the raw data collected and the analyses performed to develop the profile must be retained **indefinitely**.
- If you develop a disinfection benchmark, the raw data collected and the analyses performed to develop the benchmark must be retained **indefinitely**.

As Alaska adopts other EPA regulations, other record-keeping requirements will come into play. Please contact your local Drinking Water Program Environmental Program Specialist if you have questions.