

Northern Flows



Alaska's Drinking Water Program Newsletter
 Issue 22 • Summer 2005

Important Information



For Water System Operators and Owners

Northern Flows

Drinking Water Program Directory

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Vacant	C/E Coordinator	269-xxxx
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Karen Leis	Regulations Spec.II	269-3082
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Message from the Manager

What a great summer we are having. It has been mostly sunny and warm here in South-central Alaska, and for much of the state. I hope the good weather continues; however, I also hope we have the much needed rains throughout the state. The unpredictable nature of weather, a force we have no control over, and our desire to maintain the balance between our wants and needs is often challenging. The concept of "balance" and associated "wants" and "needs" for public water systems and the State of Alaska is also challenging. The world of drinking water is changing so quickly, so many rules and requirements, and too few resources. This issue of the newsletter will focus on the concept of achieving balance linked with my continuing theme of proactive behavior.

Our rules development process is moving slowly. We had planned to have several new rules effective at

this time; however, we have been challenged to meet that goal. It now looks like the Arsenic Rule, Variances and Exemptions Rule, Radionuclides Rule, Filter Backwash and Recycling Rule, and new Analytical Methods will become effective sometime in September 2005. This is several months later than planned, but at least will be completed this year. Our next federal drinking water rule to be adopted by reference will be the Long Term 1 Enhanced Surface Water Treatment Rule. Our plan is to complete this Rule adoption by December 31, 2005. The Class C water system regulations are under revision at this time, and it is planned that they also will be effective by December 31, 2005.

Many Alaska public water system (PWS) owners and operators will be challenged to meet the new Arsenic Rule maximum contaminant level (MCL) by January 23, 2006. ADEC Drinking Water Program staff plan to notify those PWS we think will be impacted by the Rule and offer them an opportunity to participate in a joint ADEC/U.S. EPA training workshop on Arsenic Treatment Technologies. This workshop will be in Anchorage on September 13-14, 2005, at the Loussac Library auditorium. The workshop will focus on PWS design considerations and treatment options, cost estimates, the ADEC approval process, and will include discussion on the compliance options of either a variance or exemption, or developing a new source of drinking water. This workshop is free of charge to participants; however, pre-registration for planning purposes, is required.

For additional information about this workshop, please contact me, or Karen Leis at (907) 269- 3082.

One of the most important public health regulatory tools available to Alaska PWS and the Drinking Water Program is the sanitary survey. This routine detailed onsite inspection of the PWS is a proactive direct approach a PWS owner or operator can take to provide safe drinking water to their customers. Alaska has over 120 individuals approved to complete a sanitary survey of an Alaska PWS; however, at this time, we have approximately 200 PWS overdue for a sanitary survey from 2004 or earlier, and we have over 250 PWS due for a sanitary survey in calendar year 2005. In the past month, Drinking Water Program staff issued 27 Notices of Violation (NOVs) and over 80 enforcement letters to PWS owners for non compliance with their sanitary survey requirement. If you are a PWS owner, please focus on getting the sanitary survey completed for your system. A listing of ADEC-approved sanitary survey inspectors is available from the following Drinking Water Program website:

http://info.dec.state.ak.us/eh/dwww/approved_surveyors.html
 Be proactive and schedule your sanitary survey, or have the sanitary survey inspection completed for your system now before you receive a compliance letter, NOV, or possible Administrative Penalty from ADEC.

We have had some new staff join the Drinking Water Program in the

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Class B's When is an Engineering Plan Review Needed? by Johnny Mendez

WHAT IS A CLASS B PWS?

A Class B PWS serves 25 or more individuals for 60 or more days out of the year and is not a Class A PWS. These PWS's are also called transient, non-community water systems because they serve a transient population. Examples include:

- o Restaurants
- o Lodges
- o Churches
- o Gas Stations
- o Hotels/Motels

This article is meant to clarify, for owners/operators of Class B PWS, the regulatory requirements for when the submittal of engineering plans is needed.

WHY ARE ENGINEERING PLANS REQUIRED?

In the past year the Department has seen an increase in the number of Class B PWS being constructed or modified without going through the necessary engineering plan review process as required by the Drinking Water Regulations, 18 AAC 80.200. This section of the regulations requires that the owner or operator of a public water system submit and obtain approval of engineering plans **prior** to constructing, renovating, improving, altering or operating a Class B PWS. Notice the emphasis on the word "prior."

Besides being required by the regulations, constructing a project without prior approval can cost the PWS more money than one that has received the proper approvals. A common mistake is constructing wells or distribution systems that do not meet the separation distance

requirements to potential sources of contamination such as fuel tanks, sewer lines, septic tanks, or leach fields. Correcting this problem after construction may require a waiver application and waiver review fee or may require reconstructing the components in order to be in compliance with the regulations. Either way, extra time and expense will be added to the project. This problem can be avoided with a complete submittal and approval of engineering plans well in advance of the proposed construction.

WHEN ARE ENGINEERING PLANS REQUIRED?

There are three main instances when an owner of a Class B PWS needs to submit engineering plans for our approval:

- ◆ When a new Class B PWS is planned to be constructed. This may also include cases where an existing Class C PWS is expanding its operation to include serving more than 24 individuals for 60 days or more.
- ◆ When an existing Class B PWS is to be modified. These modifications may include:
 - a. Developing a new source such as drilling a well or developing a new surface water source.
 - b. Adding, removing or replacing water storage tanks.
 - c. Expanding the current distribution system (i.e., adding new loops or branches) or replacing part or all of the existing distribution system.
 - d. Adding or changing a water treatment system for a system with a surface water source or "ground water under the influence of surface water" source.
 - e. Adding or changing a water

treatment system intended to remove a contaminant that has a Maximum Contaminant Level (MCL) listed in 18 AAC 80.300. Common water treatments are for the removal of arsenic, nitrate, or volatile organic contaminants.

- ◆ When a PWS source or distribution system does not meet the separation distance requirements in 18 AAC 80.020 and a waiver request is needed. For existing Class B systems, inadequate separation distances may be discovered during a routine sanitary survey or as the result of an engineering report developed for a property sale. In other cases, a new wastewater disposal system is to be installed but the necessary separation distances cannot be achieved due to physical site constraints (e.g., small lots); please note that **prior** approval is required for wastewater systems as well.

When in doubt as to whether engineering plans are required, give your local ADEC office a call and ask to talk to the Drinking Water Program engineer. The phone number to your local office can be found on the back page of this newsletter.

WHAT ARE ENGINEERING PLANS?

Engineering plans include, but are not limited to, construction drawings and specifications, design criteria, information on sizing pumps, tanks, or treatment systems, and documentation that the proposed system can meet minimum required pressures and flows. The design engineer is also responsible for ensuring that separation distances are met, the PWS components selected

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Class B's When is an Engineering Plan Review Needed? cont'd. by Johnny Mendez

are approved for potable water systems, and the design is protective of public health.

Plans must be prepared by a professional engineer licensed in the State of Alaska. A civil or environmental engineer can be found in your local yellow pages or through references. Licensed engineers are listed in the State of Alaska Division of Occupational Licensing website at: <http://www.dced.state.ak.us/occ/search3.htm>

HOW DOES THE ENGINEERING PLAN REVIEW PROCESS WORK?

The way the engineering plan review process works is that the owner of a PWS hires a professional engineer who submits design plans for approval by the Department. If all the regulatory requirements are met, then a "Construction Approval" is issued. The owner or operator has 2 years to construct/modify the PWS before the approval is void. After construction is completed, final as-built or record drawings are submitted to ADEC together with **ALL** other requirements

stipulated in the Construction Approval letter in order to obtain "Operation Approval." Once operation approval is granted the PWS may start operating the new or modified drinking water system.

If it turns out that you need to submit engineering plans to ADEC, here are a few things to keep in mind:



- ◆ The timeframe for ADEC to conduct a plan review is typically 30 days; however, it may take longer depending on the current workload. As a rule of thumb, summers are much busier than winters. So plan ahead and leave enough time to obtain a drinking water construction approval before the anticipated project start date.

- ◆ After your project is completed you

may not start using the new PWS or the changes made to the system until Operation Approval is obtained from ADEC. This will also take some time to process. Please allow up to 30 days from the time that complete plans, including any necessary review fees, are submitted for ADEC to process your request. An interim approval to operate may be requested in some instances when not all the requirements for the final operation approval have been completed. Requests for interim operation approval may be processed in a shorter time period. Also, please keep in mind that if the plans are incomplete or more information is needed by the review engineer, the approval process will likely take longer.

- ◆ In order to assure a timely and streamlined engineered plan review process, please advise your engineer that ADEC has developed a series of plan-review checklists to assure a complete submittal. These checklists can be found on the Drinking Water Program website at: <http://www.dec.state.ak.us/eh/dw/dwmain/engineering.html>

INFO TID BITS for Stage 2 DBP Rule

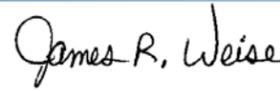
◆ Did you know EPA will be publishing new Disinfectant and Disinfection Byproducts regulations at the end of the year (called the Stage 2 Disinfectant and Disinfection Byproducts Rule)? This new regulation will apply to systems that add a primary or residual disinfectant other than UV light or that delivers water that has been treated with a primary or residual disinfectant other than UV light. The earliest provision of this new Rule is the Initial Distribution System Evaluation (IDSE), which would require systems to conduct a monitoring program to identify the best monitoring locations for determining compliance with maximum contaminant levels for total trihalomethanes (TTHM) and haloacetic acids (HAA5). According to EPA's proposed rule, water systems having all TTHM samples from all monitoring locations over a specified two year time period less than or equal to 0.040 mg/L and all HAA5 samples from all monitoring locations over a specified two year time period less than or equal to 0.030 mg/L may not be required to conduct an IDSE if the system has no monitoring violations. (This is called a "40/30 certification.") Consecutive systems that have not been required to collect TTHM and HAA5 samples may be able to receive a 40/30 certification if they start collecting TTHM and HAA5 samples before the Rule becomes effective. Contact your local ADEC Drinking Water Program office for further information.

Message from the Manager cont'd. *by James Weise*

Anchorage Office over the past month. These staff include: Gloria Collins, Regulations Specialist; and Brad Ault, Compliance and Technical Services Manager. Please welcome these new staff if you visit

the Anchorage office. It is great to be able to fill our vacancies to allow for more timely completion of drinking water projects and response to PWS owners and operators.

Have a great summer!



James Weise
Manager
Drinking Water Program ~

Overdue Sanitary Surveys *by Sara Rysh*

Sanitary surveys are required on a routine basis for all Class A and Class B public water systems (PWS). They are required as a part of the Total Coliform Rule, which ADEC adopted in 1993. This requirement can be found in Alaska's Drinking Water Regulations 18AAC 80.430. Most Class A and B PWS that collect fewer than five total coliform bacteria samples per month are required to have a sanitary survey every five years. A list of PWS with overdue sanitary surveys, along with a list of systems due in 2005 can be found on our website at: →

Sanitary surveys are essential in helping ADEC better understand how a system is operating and ensure that the water system is providing safe water and protecting public health. It is a comprehensive inspection of the entire drinking water system including its management. Sanitary surveys provide an on-site review of the water source, facilities, equipment, operation and maintenance, and management of the PWS in order to evaluate its adequacy with respect to public health protection. The survey is often a tool used in diagnosing any issues the system may be having and assisting the PWS owners and operator in improving their system performance. They also provide a historic record of PWS conditions and operations as well as verify the current configuration of the PWS.

The three basic components of a sanitary survey include: an initial

http://www.dec.state.ak.us/eh/dw/main/sanitary_surveys.html

compliance monitoring and reporting data review, an on-site inspection of the water source and facility, and subsequent completion of the sanitary survey forms and submittal to ADEC.

◆ An initial data review of the system should be completed before the actual inspection of the water system. This review should include the sampling compliance schedule specific to the water system, any correspondence documenting deficiencies or violations, and a review of the engineering plans (initial plans and modifications to the plans) of the system including any and all treatment done to the water.

◆ The on-site inspection is the main part of the sanitary survey. This inspection is an on-site visit to look at the water source intake as well as the components of the water system including its distribution system. The inspector will verify that the components of the system match the record drawings on file with the ADEC. The sanitary survey inspector will also check for compliance with Alaska Drinking Water Regulations including water intake construction and condition, appropriate NSF approvals, cross connection control plans, and water sampling plans. The sanitary survey inspection forms will be filled out and pictures taken of the system.

◆ The inspector will follow up the on-site visit by sending the completed sanitary survey inspection forms along with a cover letter prioritizing

sanitary risks to ADEC. The water system owner should be informed of any deficiencies during the on-site survey before the letter is sent.

ADEC personnel or an ADEC-approved sanitary survey inspector can complete sanitary surveys of Alaska PWS. The requirements to become an approved sanitary survey inspector include completion of an ADEC-approved training course, passing of an examination, an application, and a fee. A list of approved sanitary survey inspectors in your area can be found at →

Sanitary surveys provide an excellent opportunity for an independent qualified 3rd party review of the water system. Because each inspector is approved as a drinking water professional, they can provide the operator of the water system both education and technical assistance. This will help keep the water system in compliance with ADEC regulations. Sanitary surveys in addition to routine monitoring of water quality and the review of construction plans are important tools the ADEC uses for assuring that drinking water is made safe.

Sanitary surveys are an integral part of ensuring your system is working correctly. ADEC will be taking a strong enforcement stand to make sure all systems have a current sanitary survey and that all sanitary survey inspectors are properly trained and approved. ~

http://info.dec.state.ak.us/eh/dwwww/approved_surveyors.html

Staff Profile- Statewide Database Coordinator *by Cindy Christian*

Maria Ridgway is the Drinking Water Program Statewide Database Coordinator in the Anchorage Office. She is responsible for many database activities in the Drinking Water Program, including oversight of the Safe Drinking Water Information System (SDWIS-State), implementing modifications to the SDWIS-State database to support Drinking Water Program Compliance and Enforcement efforts, determining the accuracy and completeness of drinking water data (PWS data) transferred to the federal EPA SDWIS database (SDWIS-FED), and numerous other special database and electronic reporting projects. Maria is responsible for all database programming that allows Drinking Water Program staff to retrieve compliance reports and track PWS data in the SDWIS-State database. She also works closely with EPA to make sure that PWS data is reported according to requirements in the ADEC/EPA Performance Partnership Agreement. These responsibilities are vital to the Drinking Water Program because of the integral nature of the SDWIS-State database. All compliance and enforcement decisions are based on PWS data in this database. Maria is also currently directing work on two very important projects: the Electronic Data Reporting System (EDRS) and the Enhanced Electronic Sanitary Survey (EESS). The EDRS will allow ADEC-certified laboratories to transfer drinking water test data

directly to the Drinking Water Program electronically through a web-based interface. The EESS will allow Drinking Water Program staff and ADEC-approved sanitary survey inspectors to perform sanitary surveys using either a PDA, laptop, or desktop computer.

Maria graduated from De la Salle University in the Philippines with a bachelor's degree in Chemical Engineering. She moved to California in 1985 and then came north to Alaska in 1987. Maria and her family lived in Bethel for three years, where she worked for the Yukon Kuskokwim Health Corporation. In 1990, she came to work for the Drinking Water Program in Juneau as an Environmental Engineer, working mostly on the new Total Coliform Rule. Maria moved to Anchorage in 1991 and she continued to work for the Drinking Water Program as a Compliance and Enforcement Officer, working mainly with public water systems in the South-central area of the state. In 1996, Maria became the Analyst Programmer and Database Coordinator for the Drinking Water Program. At that time, all PWS data was stored in the Advanced Revelation (AREV) database which Maria maintained for the entire Drinking Water Program. In 2001, the Drinking Water Program started using the SDWIS-State database and Maria was responsible for getting the system up and running, and transferring all of the historical data out of AREV and into SDWIS-State. This required a massive



effort and Maria was instrumental to the success of the project.

Maria has many interests outside of work. She loves to travel with her daughter, Faith, and they travel outside of Alaska whenever they can. Maria and Faith also love to shop and take every opportunity to do so on their many adventures abroad. While in Alaska, they enjoy traveling around the state in the summer, fishing and camping with their family and friends.

Maria is a very important member of the Drinking Water Program team. She provides invaluable support to the Environmental Program Specialist and Environmental Engineering staff by making sure that all the PWS information databases are operating as efficiently as possible. She enjoys the challenge of the ever-changing and increasingly complex job of providing public health protection through implementation of the Drinking Water Regulations. ~

Question: Which instrumentation and laboratory equipment is not required to properly operate a water treatment plant? A) Flow meter B) Thermometer C) Headloss indicator D) pH meter E) Turbidimeter

Resources Corner: Southeast Alaska Rural Health Consortium *by Carrie McMullen*

Southeast Alaskan communities are truly lucky to count the Southeast Alaska Rural Health Consortium (SEARHC) as an ally in their efforts to protect public health and provide safe water. SEARHC (pronounced "search") is a non-profit tribal health consortium of 18 communities addressing health issues in southeast Alaska. Created under provisions of the Indian Self-Determination Act in 1975, the mission of SEARHC "is to provide the highest quality health services in partnership with Native people."

This mission is achieved through a variety of programs such as Raven's Way, The Community Family Services Program, WISEWOMAN, The Seven Circles Coalition, and The Community Wellness Advocate-making a difference in the health of their community by promoting health education activities. SEARHC also operates several medical facilities in southeast Alaska, including primary health care clinics. The Juneau Clinic is one of the largest ambulatory care facilities in Alaska and has repeatedly been rated among the best facilities in the state in national accreditation reviews.

The SEARHC Office of Environmental Health (OEH) offers communities assistance in a variety of subjects including injury prevention, boating safety and survival skills, car seat use, bicycle safety, food safety, clinic maintenance, and water and wastewater treatment. For many water and wastewater treatment

operators in southeast Alaska, OEH staff are the first point of contact for training, general assistance and help in emergency situations. SEARHC offers a variety of training such as Introduction to Small Water and Wastewater Systems OIT/Level 1 courses, and many operations and maintenance courses. OEH staff also make frequent visits to southeast Alaska communities to conduct routine sanitary surveys of the drinking water systems, provide hands on training, and to provide aid and assistance during times of crisis.

Each winter, SEARHC coordinates with other organizations and agencies, such as the Alaska Native Tribal Health Consortium (ANTHC), the Rural Utility Business Advisor (RUBA), and ADEC, as well as representatives of the southeast Alaska communities, to discuss and prioritize sanitation projects within southeast Alaska for which funding is needed. This annual meeting offers communities an opportunity to collaborate with funding, regulating and assistance agencies to find the best way possible to address the ongoing sanitation needs in southeast Alaska.

Communities in southeast Alaska are very fortunate to have the expertise and support of the SEARHC OEH staff. In the fall of 2004, Shawn Sorenson took on a new role as SEARHC's Director of Facilities Management. Tom Fazzini joined the OEH in February, 2005 when he stepped in to fill the Environmental Health Director position vacated by



Shawn. Before coming to SEARHC, Tom served as the Director of The Yukon-Kuskokwim Health Corporation's Injury Prevention/Emergency Medical Services Program. Environment Health Specialist, Paul Audette, has been employed by SEARHC for 10 years, the past 5 of which have been with the OEH. SEARHC also provides southeast Alaska with a remote maintenance worker, Bill Evans, who has been part of the program for the past three years. Each of these individuals makes tremendous contributions to the health and safety of our communities, as well as to the compliance of drinking water and wastewater systems in southeast Alaska.

The ADEC Drinking Water Program relies heavily on the coordinated efforts of the SEARHC Office of Environmental Health and would like to express our sincere gratitude for the dedication, determination and inspiration they provide to our common mission of protecting public health. We look forward to continuing to work closely with SEARHC and the communities of southeast Alaska to reach this goal. You can find more information about SEARHC at their website: <http://www.SEARHC.org>

Answer: This was a trick question, for most systems, in order to properly operate a water treatment plant, there is a requirement for the following instruments: Flow meter, Turbidimeter, Headloss indicator, and a Thermometer. Laboratory equipment needed includes : Jar test equipment, for determining proper chemical dosage; pH meter; a method of testing for alkalinity; and fluoride and chlorine testing equipment.

Long Term 1 Enhanced Surface Water Treatment Rule *by Scott Forgue*

What do I do now that I have a two year extension?

The Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR) became effective on January 1, 2005. This Rule applies to public water systems (PWS) that use **surface water** or **ground water under the direct influence of surface water** (GWUDI) and serve fewer than 10,000 people. The purpose of the rule is to improve public health protection through the control of microbial contaminants, and most specifically *Cryptosporidium*. Because *Cryptosporidium* is very resistant to chlorine, the most widely used drinking water disinfectant, the rule requires 99% (2-log) removal of *Cryptosporidium* through filtration.

Existing PWS that use alternative filtration system cartridges and bags may not be able to satisfy this removal requirement and will need to be upgraded. The filter elements commonly in use for these types of systems were not designed or tested to verify that they are able to consistently provide 2-log removal of *Cryptosporidium*. The Rule provides for an extension of up to two years to allow system owners to make capital improvements past the January 2005 compliance date without the system being considered in violation with the LT1ESWTR.

In December 2004, ADEC contacted the owners of systems that might qualify for this extension. If you submitted an extension request and it was approved by the U.S. EPA, you should have received your approval by now. If you did not request an extension and still want one, or if you have questions regarding whether or not your request was approved, contact your local area Drinking Water Program office.

If your extension request was approved, you have until January 1, 2007, to meet the new filtration requirements. At this point, that may seem to be plenty of time; however, there are several water system owners who will all be working toward meeting this deadline at the same time, and both the engineers preparing the necessary plans and the plan review engineers in ADEC who review those plans will be busy. Therefore, we recommend that you take action now to begin addressing your necessary upgrades. At a minimum, the following dates need to be met:

- ◆ **Submit Project Report to ADEC: December 31, 2005**
- ◆ **Submit Construction Documents to ADEC: March 1, 2006**
- ◆ **Complete System Modifications and Receive Approval to Operate: December 31, 2006**

The **project report** needs to contain an explanation of how the system owner intends to proceed with designing the improvements, receiving approval of engineering design plans, and implementing the approved design.

The **construction documents** need to include complete engineering plans and specifications for the installation of an improved filtration system. The filtration systems proposed must achieve 2-log removal of *Cryptosporidium*. Filtration systems certified to NSF/ANSI Standard 53 for cyst reduction meet this requirement. The use of a filtration system which is not certified to this standard should be discussed with the ADEC plan review engineer in your area before proceeding with the design.

Completing system modifications and receiving approval to operate will require that the construction approved by the Department be complete, and engineered as-built plans submitted to the ADEC Drinking Water Program Engineer for review and approval no later than December 1, 2006.

Anyone having questions regarding these requirements is encouraged to contact the local area office of the Drinking Water Program. ~

Electronic Data Reporting System *by Daniel Rogers*

The Electronic Data Reporting System (EDRS) was developed jointly by EPA, DEC, and private laboratories (labs) and went "live" on June 15, 2005. EDRS will allow labs to submit chemical and coliform data to ADEC electronically in an XML format, by Excel spreadsheet, or by using a web entry form. The web entry form, however, only allows entry of

coliform data. We are currently assisting labs in getting their personnel signed up as authorized users. We encourage all labs to contact us if they are interested in using the system.

The use of EDRS by labs will remain voluntary until mid 2006, when regulations requiring all labs to submit water sample data electronically are planned to be in effect.

In the coming months, we will be working with labs and Drinking Water Program staff in continuing the development and refinement of EDRS to better serve the needs of PWS, ADEC and labs. We would like to thank EPA and all the labs that assisted ADEC in the creation of EDRS and look forward to continuing work with everyone in the future. ~