Regulatory Update

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Hot Topics in Rules

• Total Coliform Rule Revisions – “coming soon”
• Lead and Copper Rule: Changes and New Studies
• “Contaminants of the Day”
  – Manganese
• Change in Fluoride Dose
• Unregulated Contaminant Monitoring Rule (UCMR 3)
• Annual Water Quality Report
EPA has revised the TCR

Overall shift in focus

- From: TC positives requiring public notification
- To: Monitoring results triggering investigation and corrective action

Benefits

- More proactive approach to public health protection
- Reduction in customer confusion associated with Public Notification actions for TC violations
Overview of RTCR

• Use TC as part of an overall “treatment technique”
  – No MCLG/MCL for TC
  – TC 5% exceedance triggers assessment and corrective action (of any defect found)
  – Violation only if assessment or corrective action is not completed

• *E. coli* retains MCLG/MCL = 0
• Fecal Coliform no longer used

• Public Notification for failing to do assessment/corrective action or acute *E. coli* MCL violations
• EPA Requires that it be implemented no later than March 31, 2016

• Massachusetts DEP has indicated that it will implement early – perhaps as early as the end of 2013!

• How to prepare for RTCR:
  – Continue to monitor and closely examine all positive samples
  – Use DEP’s draft assessment forms for any 5% exceedance
  – Provide DEP feedback on the forms

• If given chance, urge DEP to move quickly to implement the revised rule
Continued good news on lead

Figure 1 - 90% Lead Levels in MWRA System of Fully Served Communities: 1992-2012

Lead Action Level = 15 ppb
Many issues identified in EPA sponsored workshops in 2004
Ongoing research on corrosion, materials, benefits and risks of remedial actions
Recent CDC and other health data
“Case Studies” for actual community experiences
May see draft revised LCR in 2014
Lead Service Line Replacement

• Partial LSL replacement often occurs due to ownership (utility only owns to the curb stop)
• Research shows that with partial replacement lead levels in home do not drop significantly
• Levels rise dramatically right after, in both full and partial
• CDC Study: Kids blood lead levels elevated
• Science Advisory Board review
• Is there benefit from partial service replacement or should it be left alone?
• Better flushing guidance?

• Short term take-away – -more aggressive outreach and record keeping
Lead in Brass

• New 0.25 lead content standard in California, Vermont and in January 2014, nationwide

• Opportunity for utility leadership
  – “get the lead out” sooner

• Cannot use old brass materials after January 2014
• Be sure your purchasing and engineering specs are up to date
• Check inventory – use up old stuff first
Fluoride Dose Change?

• In January 2011, EPA, Dept of Health and Human Services and CDC issued draft recommendations to lower fluoride dose from 1.0 to 0.7 mg/l
• MWRA follows CDC guidance on fluoride
• Still awaiting final guidance from agencies
• MWRA will implement any recommended changes

• Rationale:
  – Many other sources of fluoride now
  – Potential for mild teeth staining
  – No change in basic health recommendation
DEP Manganese Advisory and Sampling

- DEP considering issuing a health advisory for manganese
- Current aesthetic secondary standard is 50 ppb
  - Considering HA of 300 ppb (target is infants drinking formula)
- Will likely require annual testing
  - Will likely require CCR notice if above 50 ppb
  - Will require some sort of public notification process if above 300 ppb
- MWRA is reliably below 50 (typically around 10 ppb)
Unregulated Contaminant Monitoring Rule

- Requires monitoring for 28 chemicals and 2 viruses
- All systems over 10,000; sample of smaller systems

- Previously only MWRA required to sample
- Now each individual community is monitored

- MWRA is sampling for all fully supplied communities – first round was January 2013

- Expect to have some detects – to be reported in 2014 CCR
- We’ll keep you posted
Consumer Confidence Report

- This Year’s Theme – Tap Water and Public Access (fountains)
- Schedule and outreach same as previous years
- Will continue to do direct mailing of paper CCR (21¢ per copy)

- Best foot forward with community letter
- But, any NON’s must be in letter
- And meeting info
- And lead and TCR data
Questions or Comments?

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