

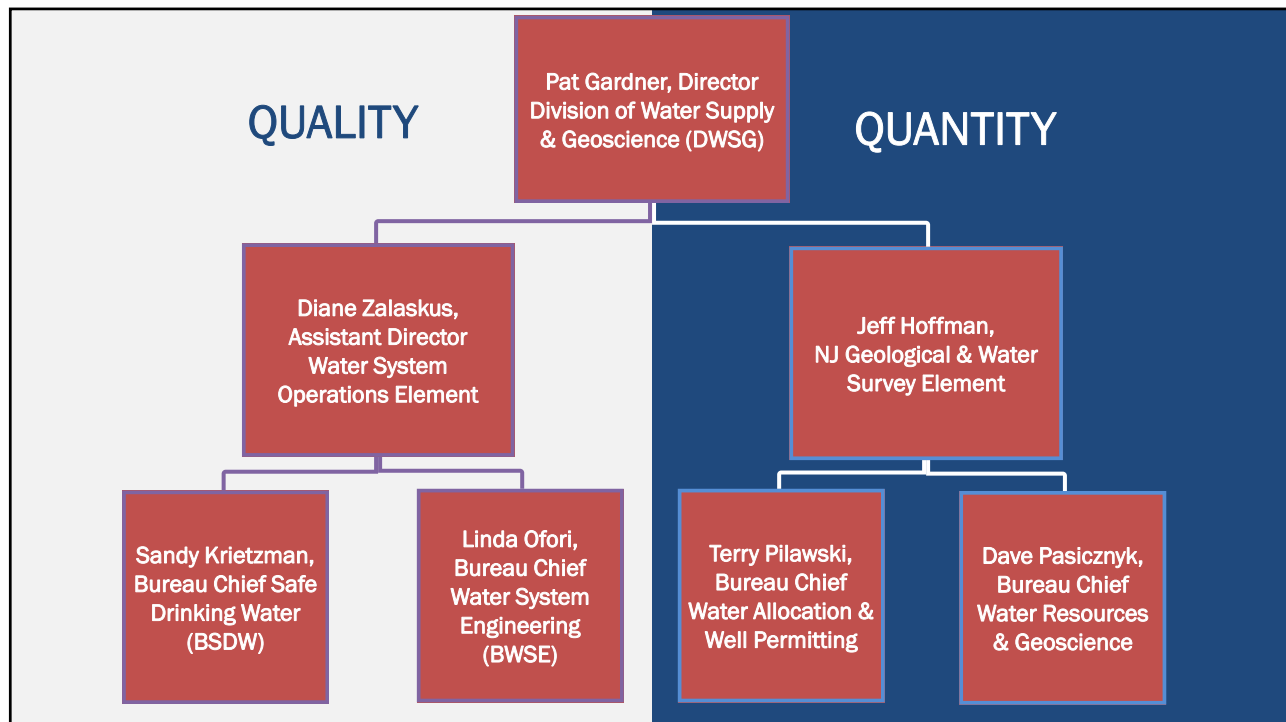


# SAFE DRINKING WATER UPDATE

April 26, 2018



Kristin Tedesco  
Environmental Engineer  
Bureau of Safe Drinking Water  
p 609-292-5550  
f 609-633-1495  
[kristin.tedesco@dep.nj.gov](mailto:kristin.tedesco@dep.nj.gov)



## NOTABLE CHANGES



### ➤ RETIREMENTS

*Steve Doughty*  
*Gale Witkowski*  
*Gene Callahan*  
*John Burke*  
*Pat Bono*

### ➤ NEW STAFF

*Filina Poonolly*  
*Angela Cappetti*  
*Kelly Hullen*  
*Joe McNally*  
*Darian Capellan*  
*Brandon Carreno*  
*Minnie Tangasi*  
*Yoshi Nakajima*  
*Matt Jones*  
*Patti Stelmaszczyk*

## NOTABLE CHANGES IN YOUR ORGANIZATION?



Email: [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov)

And look for information requests in 2018!

## GENERAL CONTACT & FEE BILLING CONTACT UPDATES



<http://www.nj.gov/dep/watersupply/dws-sampreg.html>

Public Water System Contacts Update Form		
*Asterisked fields are MANDATORY to fill out. Other fields are optional.		
Submit this form to the Bureau of Safe Drinking Water by email to <a href="mailto:watersupply@dep.nj.gov">watersupply@dep.nj.gov</a> or by fax to (609) 292-1654.		
*PWS Name:	*PWSID:	
*Form Completed By (Name):	*Phone No.:	*Date:
*General Contact <sup>1</sup>		
*Name:		
*Email:		
*Phone No.:	Fax:	

**DWSG is relying more on email communication!**



# THE SAFE DRINKING WATER PLEDGE

## MISSION STATEMENT



The Division of Water Supply & Geoscience (DWSG) works to ensure New Jersey has adequate, reliable, safe and sustainable water for **current and future needs, users and the environment**. This is supported by scientific analysis including geologic analysis and expertise for the development and implementation of sound policy and regulations.



## THE 2018 SAFE DRINKING WATER PLEDGE

 **TAKE THE  
PLEDGE**



## WE ARE GETTING BACK TO BASICS BY ...

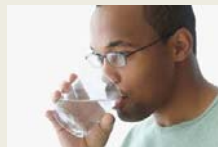
- ✓ Remembering who we serve
- ✓ Renewing our focus
- ✓ Understanding and accepting of our roles and responsibilities
- ✓ Encouraging partnerships
- ✓ Rewarding compliance
- ✓ Consistently taking action when needed



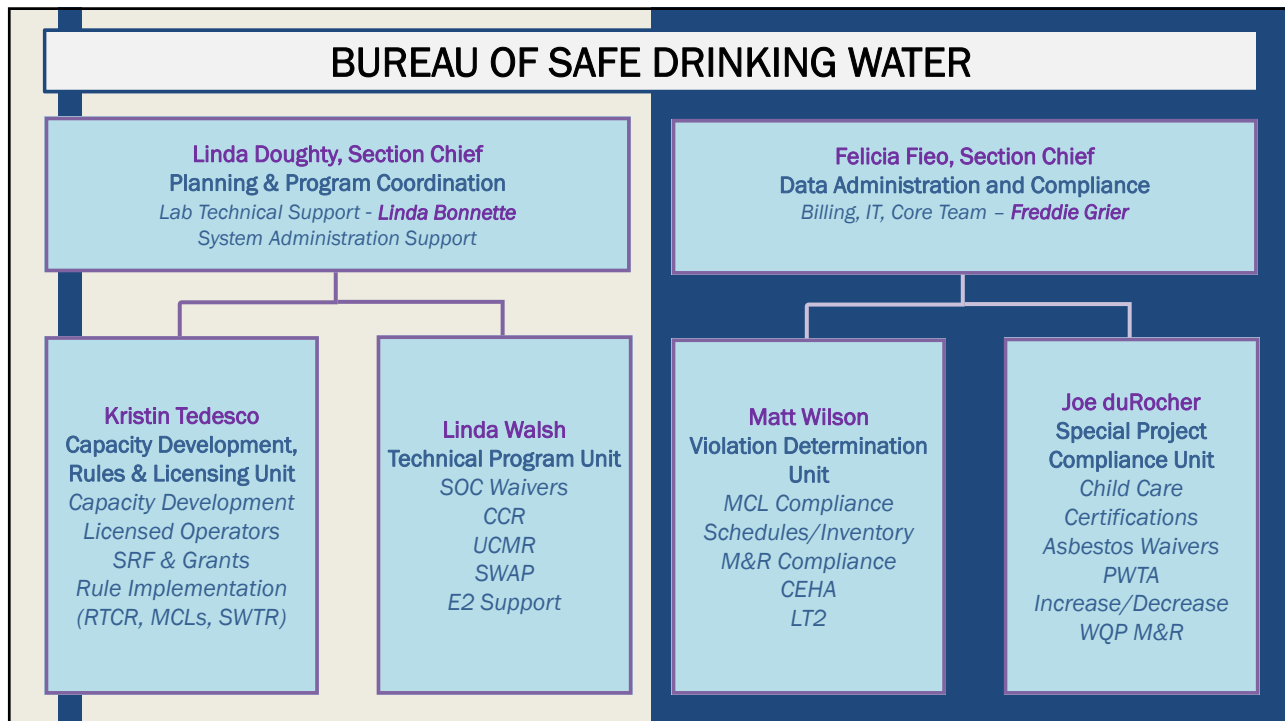
## WE COMMIT TO...

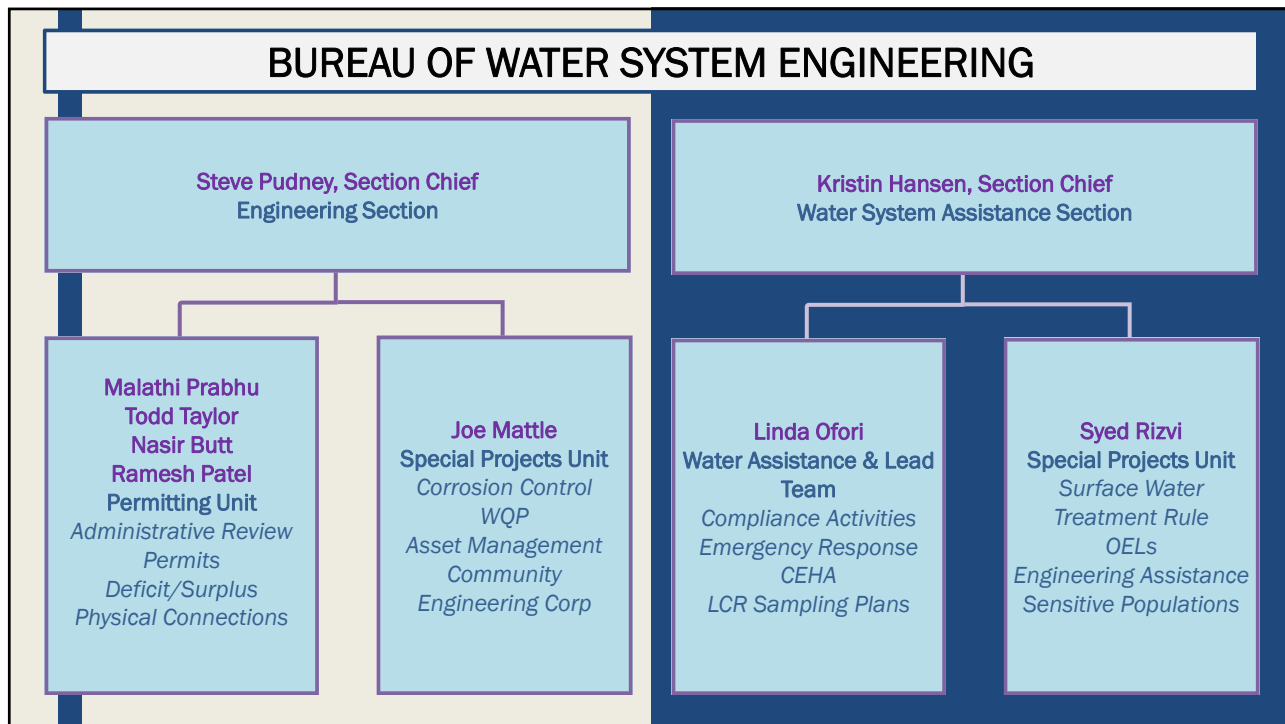
- ✓ Always put public health first
- ✓ Acknowledge the importance of our work
- ✓ Perform our duties in an ethical manner
- ✓ Continue with self-assessment and make improvements
- ✓ Adhere to the regulations
- ✓ Provide training and support as needed

## WE ARE HERE FOR



# REORGANIZATION







# WHAT'S TO COME? 2018





## STAKE-HOLD-ER

[ˈstākˌhɒldəɹ]  
NOUN

- A person with an interest or concern in something, especially a business
  - *Denoting a type of organization or system in which all the members or participants are seen as having an interest in its success*



# OPERATOR CERTIFICATION PROGRAM

Program Assessment

# GOALS



- 1) Ensure that all CWS and NTNCWS have the appropriate licensed operator
- 2) Assist with the training, certification, and license renewal of operators
- 3) Review training courses for initial certification and continuing education
- 4) Make training more available and affordable to operators
- 5) Use Federal funds to enhance program and assure that NJ meets EPA guidelines

# PROGRAM ASSESSMENT

- Roles and Responsibilities
- Hours spent at systems
- Internal Processes
- Recruitment and Partnerships
- Training
- Guidance and resources of the program





## FEEDBACK FROM STAKEHOLDERS

- *“Are there minimum hours a licensed operator of record should be present for?”*
- *“How many systems is one operator permitted operate?”*
- *“What are the roles and responsibilities of a licensed operator?”*
- *“How are drinking water systems classified?”*
  
- Thoughts and comments on how to improve the quality of the program?
  - Can be sent to DEP Water supply mailbox ( [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov) )



## CAPACITY DEVELOPMENT PROGRAM

Drinking Water System Capacity

# GOALS



1. Reduce existing public water systems in significant noncompliance with Federal and State regulations
2. Prevent the formation and operation of any community or nontransient noncommunity water systems that may be non-viable
3. Promotion and maintenance of water system technical, managerial, and financial capacity
4. Providing accurate and timely resources and technical assistance to existing and new public water systems

# BASICS OF CAPACITY DEVELOPMENT



## Signs of Poor TMF Capacity

- People seem confused about their jobs
- Work force lacks necessary skills
- No clear define objectives
- Poor communication
- Consistent violations
- Cannot work together to achieve common goals
- Customers very dissatisfied
- Feels like your constantly fighting or getting in each other's way

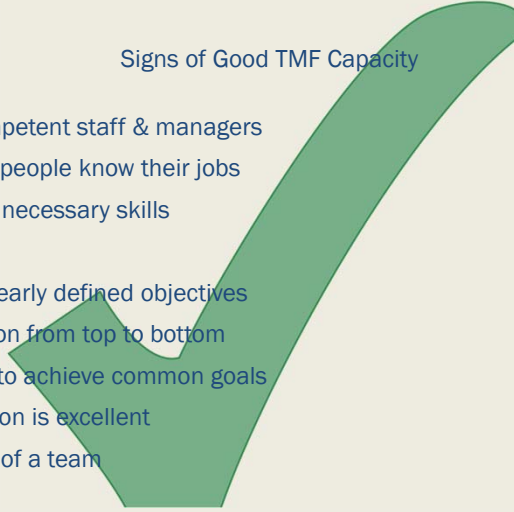




# BASICS OF CAPACITY DEVELOPMENT

## Signs of Good TMF Capacity

- Recruit & keep competent staff & managers
- Routine training so people know their jobs
- Practice to develop necessary skills
- Lack of violations
- Organization has clearly defined objectives
- Good communication from top to bottom
- Work well together to achieve common goals
- Customer satisfaction is excellent
- Feels like your part of a team



# PROGRAM ASSESSMENT

- Methods and criteria in identifying and prioritizing systems in need of assistance
- Factors that will aid and impair the program
- Renewing resources vital to the program
- Measurement of system improvements
- Stakeholders and partnerships of the program
- Internal process
- Training and familiarity of the program





# OTHER STATE PROGRAMS...

## Operator Certification

- *Delaware's* Online Course Development for Water System Operators
- *South Dakota's* Asset Management Workshops
- *Tennessee's* Plan to Enhance Operator Knowledge through Academic Partnerships

## Capacity Development

- *Pennsylvania's* Master Well Owners Network
- *Massachusetts's* Capacity Development Training for Sanitary Survey Staff
- *Mississippi's* PEER Review Program

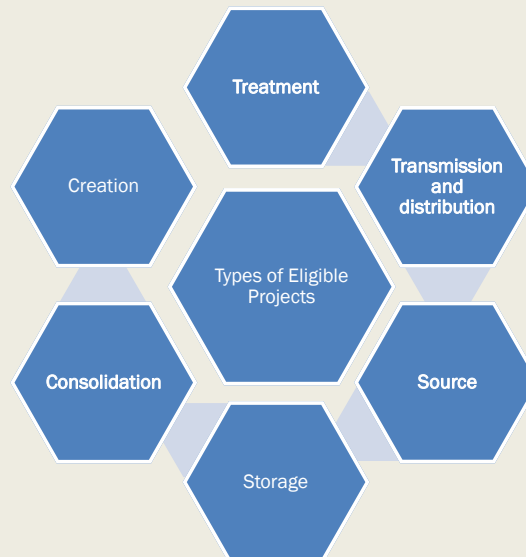


# DWSRF

## ■ Types of Eligible Projects

The DWSRF is a financial assistance program to help water systems and states to achieve the health protection objectives of the Safe Drinking Water Act.

- (See [42 U.S.C. §300j-12](#))





## SIX DIFFERENT DWSRF LOAN PROGRAMS

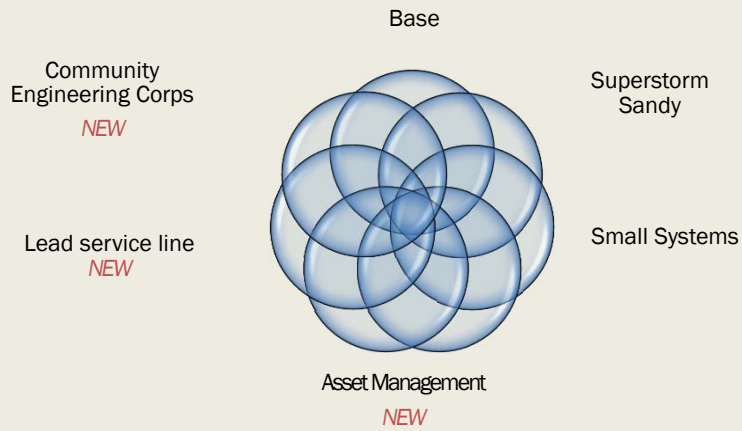


Table 2: Long-Term Funding Packages Breakdown - Drinking Water

Drinking Water	Principal Forgiveness	DEP 0% *	Trust Market Rate**	\$ Savings as % of Total Loan ***
Asset Management Plan Development	100%	0%	0%	100%
Lead Service Line Replacement	90%	10%	0%	93%
Nano	50%	25%	25%	57%
Superstorm Sandy Relief	19%	56%	25%	34%
Planning and Design	0%	100%	0%	27%
Base DWSRF	0%	75%	25%	20%

\* DEP portion of funding is at 0% interest

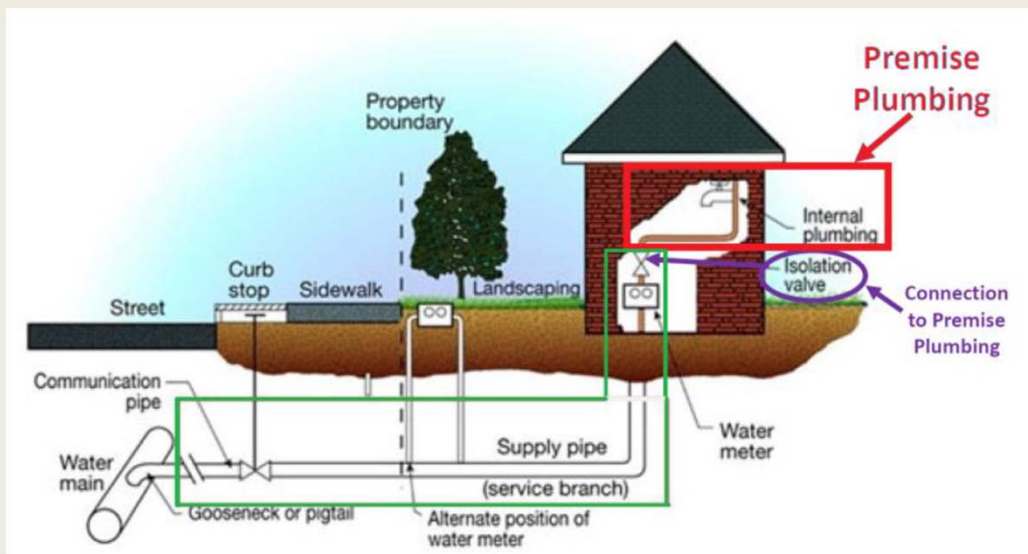
\*\* Trust portion of funding is at AAA market Rate

\*\*\*Saving based on comparison to AAA market rate municipal bond, as of October 2016 and administrative fees





## LEAD SERVICE LINE REPLACEMENT



## WATER QUALITY ACCOUNTABILITY ACT

[chelsea.dubrul@dep.nj.gov](mailto:chelsea.dubrul@dep.nj.gov)  
[katrina.angarone@dep.nj.gov](mailto:katrina.angarone@dep.nj.gov)  
 609-292-7219





## WATER QUALITY ACCOUNTABILITY ACT (N.J.S.A. 58:31-1 ET SEQ.)

- Enacted July 21, 2017 and Effective October 19, 2017
- Applies to water purveyors with more than 500 service connections
  - *Approximately 300 purveyors in NJ*
- To improve the safety, reliability, and administrative oversight of water infrastructure



## CYBERSECURITY PLANS



- By February 16, 2018, all purveyors with internet-connected control systems must have developed a cybersecurity program in accordance with NJBPU.
- 60 days after developing the program (by April 17, 2018), the purveyor must join the New Jersey Cybersecurity and Communications Integration Cell {pursuant to EO No. 178 (2015)} and create a cybersecurity incident reporting process.

## QUESTIONS/INTERPRETATIONS



1. What is an “internet-connected control system”
  - NJOHSP developing a questionnaire to determine applicability
2. Cybersecurity Plan
  - NJOSHP is developing a question based Cybersecurity plan that will have the option of requesting supporting information
3. Act only has an initial submittal requirement, no updates, but a plan is by definition something that requires updating

## ASSET MANAGEMENT PLAN



Implementation of Plan required by April 19, 2019 must include:

- Water main replacement schedule (150 years or engineered analysis)
- Supply and treatment program consistent with AWWA standards
- Any other plan or program



### ASSET MANAGEMENT PLAN CONTINUED

## Dedicate funds annually

- To address highest priority projects determined by Plan



## Funding Availability

- Drinking Water State Revolving Fund
  - Asset Management for Small Systems ( $\leq 10,000$ )
    - 100% principal forgiveness, up to \$100,000 per applicant to develop and implement plan
    - \$1M available for SFY19 (plus any remaining from SFY18)
    - Asset Management for Small Systems ( $\leq 10,000$ )
  - Asset Management for Larger Systems
    - Eligible for short-term, interest free loans with a capital improvement
- Loan Capacity and Development



# MCL DEVELOPMENT

NJ Safe drinking water act N.J.A.C. 7:10

## NEW JERSEY RULE PROCESS



- ◆ Stakeholder process
- ◆ Draft rule proposal
- ◆ Proposal published in NJ Register
- ◆ Public hearings and comment period
- ◆ Adoption within one year
- ◆ Effective date noted upon publication

## DRINKING WATER QUALITY INSTITUTE (DWQI)



- ◆ Established under 1984 SDWA and charged with recommending MCLs
- ◆ Testing, Treatment & Health Subcommittees
- ◆ Meeting information including agendas at:  
[http://www.nj.gov/dep/watersupply/g\\_boards\\_dwqi.html](http://www.nj.gov/dep/watersupply/g_boards_dwqi.html)



## NJ STANDARDS IN DEVELOPMENT

CONTAMINANT	STAGE IN PROCESS
PFNA 1,2,3 - TCP	Proposed August 7, 2017
PFOA	DWQI recommended MCL to DEP commissioner
PFOS	Now with DWQI subcommittees for evaluation of appropriate MCL
Chrome (VI) Chlorate Tertiary butyl alcohol 1,4 dioxane	Potential contaminants for review by DWQI



## PROPOSED SDWA AMENDMENTS

AUGUST 7, 2017

- ◆ Testing for 1,2,3-Trichloropropane (1,2,3-TCP) Statewide
- ◆ Testing for Ethylene Dibromide (EDB) and 1,2 Dibromo-3-Chloropropane (DBCP) Statewide
- ◆ Testing of radiological contaminants for non-transient non-community water systems
- ◆ Testing for Perfluorononanoic Acid (PFNA) Statewide



# UCMR4

2018-2020

## EXHIBIT 5—SYSTEMS TO PARTICIPATE IN UCMR 4 MONITORING



System size (number of people served)	National sample: Assessment monitoring design		Total number of systems per size category
	10 List 1 Cyanotoxins	20 Additional List 1 Contaminants <sup>3</sup>	
<b>Small Systems<sup>1</sup></b> (25-10,000)	800 randomly selected SW or GWUDI systems	800 randomly selected SW, GWUDI and GW systems	1,600
<b>Large Systems<sup>2</sup></b> (10,001 and over)	All SW or GWUDI systems (2,725)	All SW, GWUDI and GW systems (4,292)	4,292
<b>Total</b>	3,525	5,092	5,892

<sup>1</sup>Total for small systems is additive because these systems will only be selected for one component of UCMR 4 sampling (10 cyanotoxins or 20 additional contaminants). EPA will pay for all analytical costs associated with monitoring at small systems.<sup>2</sup>

<sup>2</sup>Large system counts are approximate. The number of large systems is not additive. All SW and GWUDI systems will monitor for cyanotoxins; those same systems will also monitor for the 20 additional List 1 contaminants, as will the large GW systems.

<sup>3</sup>Water systems that are not subject to HAA5 monitoring under the D/DBPRs (§ 141.Subparts L and V) are not required to monitor for the UCMR 4 HAAs or associated indicators (TOC and bromide).



## UCMR4

- EPA informed us that 29 NJ PWSs have not yet registered in CDX/SDWARS
  - *if you have not, you need to do this ASAP (EPA will assess violations)*
- If you have not yet registered in CDX for SDWARS, please do so immediately using the customer retrieval key (CRK) assigned to the water system by EPA.
- If you cannot locate your CRK, please contact the CDX Help Desk (1-888-890-1995 or [helpdesk@epacdx.net](mailto:helpdesk@epacdx.net)).



## UCMR4

### ■ UCMR4 Analytes

- ◆ 10 cyanotoxins (EPA 544, 545, 546)
- ◆ 2 metals (EPA 200.8)
- ◆ 8 pesticides (EPA 525.3)
- ◆ 1 pesticide manufacturing by-product (EPA 525.3)
- ◆ 3 brominated haloacetic acid groups (EPA 552.3, EPA 557)
- ◆ 3 alcohols (EPA 541)
- ◆ 3 semivolatile chemicals (EPA 530)

<https://www.epa.gov/dwucmr/fourth-unregulated-contaminant-monitoring-rule>

Federal Register /Vol. 81, No. 244 / Tuesday, December 20, 2016 /92666



## CYANOTOXIN SAMPLING

- Point-of-entry to the distribution system
- SW or GWUDI
- **March – November (In NJ, May – October)**
  - *Twice a month for 4 consecutive months*
  - *Two weeks apart*
  - *Total of 8 sampling events*

### 3 samples collected

1. EPA 546. If ELISA > 0.3 ug/l,
2. Analyze 2<sup>nd</sup> sample for other microcystins using LC/MS/MS (EPA 544)
3. Analyze EPA 545 for anatoxin-a and cylindrospermopsin

- Laboratories Approved by EPA to Support UCMR4
- <https://www.epa.gov/sites/production/files/2017-07/documents/ucmr4-lablist.pdf>



## CYANOTOXIN SAMPLING

- Since the intent of the cyanotoxin monitoring requirement is to sample during the most vulnerable months (i.e., the warmest months), NJDEP changed the cyanotoxin monitoring schedules for several NJ water systems.
- 47 NJ systems were affected.
  - *NJDEP sent an email to affected systems on 1/17/2018 using the email we have on record, and sent a certified letter dated 1/26/2018.*
- In case our contact information is not current, if you treat surface water or purchase surface water, log into SDWARS and check if your start month for cyanotoxin monitoring was revised.
  - *Note: The schedules for chemical monitoring under UCMR4 did NOT change – only the cyanotoxin schedules were revised.*
- If they have implementation questions on UCMR4 requirements, call Linda Walsh ([linda.walsh@dep.nj.gov](mailto:linda.walsh@dep.nj.gov)) or Kelley Meccia ([Kelley.meccia@dep.nj.gov](mailto:Kelley.meccia@dep.nj.gov)) by email or phone at 609-292-5550.





# REMINDERS

## CONSUMER CONFIDENCE REPORTS



- Reminder of health effects language for M&R violations, especially if the CCR is used to satisfy Tier 3 PN requirements
- We are *requesting* water conservation language be included in the CCR
- We are *requesting* that systems include information on how customers can sign up for notification of water emergencies
- UCMR detections must be included (2018-2020 sampling)

## SOC WAIVERS



- For any new source, submit a Well Vulnerability Questionnaire Form. Form is at:

<http://www.nj.gov/dep/watersupply/pdf/njwvq.pdf>

### What's New

- In September 2017, sent letter to systems notifying of the list of wells with completed questionnaires on file. If any wells are in use that are not listed, must submit questionnaire(s) ASAP or sample starting 1<sup>st</sup> quarter 2018.
- DEP currently conducting screening sampling program for 2017-2019 Waiver cycle
- 2017-2019 SOC Waivers will be issued by late 2018

## DRINKING WATER WATCH



- ◆ “Water Watch” is a web application available on the Division’s website used to view monitoring schedules and results.
- ◆ [www.nj.gov/dep/watersupply/waterwatch](http://www.nj.gov/dep/watersupply/waterwatch)
- ◆ “Live” information:
  - ◆ inventories
  - ◆ analytical data
  - ◆ monitoring schedules



## SUBMITTAL DOS AND DON'TS



- **Do** send only one way (email, fax, mail, E2)
- **Do** note that email is most reliable  
[watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov)
- **Don't** cc multiple people on the email
- **Do** fax to 609-292-1654 number
- **Do** take note that E2 submittals of other information may come soon but we are not there quite yet.



RTCR

## RTCR – WHAT’S NEW



- NJDEP adopts amendments to State Rules at N.J.A.C. 7:10, N.J.A.C. 7:18, and N.J.A.C. 7:9E – November 6, 2017
  - 1) *Microbiological monitoring frequency*
  - 2) *Requirements for Level 1 and Level 2 Assessments*
  - 3) *Parties approved to conduct Level 2 Assessments*
    - LO, PE, DEP (For NCWS, also well driller or CEHA)
  - 4) *DEP can extend 24-hour limit to collect repeats*
  - 5) *Start-up procedures for seasonal systems*
  - 6) *Notice that certified labs must provide to system, CEHA, and DEP for E. Coli and nitrate/nitrite results*
  - 7) *Minor administrative changes*

## TYPES OF VIOLATIONS

### *REVISED TOTAL COLIFORM RULE*



- E. coli MCL Violation
- Treatment Technique Violation
  - *Failure to conduct a Level 1 or 2 assessment within 30 days;*
  - *Failure to correct any sanitary defect within 30 days or in accordance with a schedule acceptable to the State; or*
  - *Failure to complete state-approved start-up procedures (seasonal systems)*
- Monitoring Failures and Monitoring Violations
- Reporting Violations

## 2017 NUMBER OF VIOLATIONS

### REVISED TOTAL COLIFORM RULE



- E. coli MCL Violations = 20
- Treatment Technique Violation = 164
- Monitoring Failures and Monitoring Violations = 442
- Reporting Violations = 489

## TYPES OF VIOLATIONS

### REVISED TOTAL COLIFORM RULE



- 147 Level 2 assessments since 4/2016
  - **68% or 100 Level 2 assessments are for chronic triggers (i.e. more than 1 trigger in a 12 month period) at 71 systems!**
  - 20% or 30 Level 2 assessments were for E. coli MCL violations
  - 12% or 15 Level 2 assessments were for failure to collect all repeat samples
- 310 Level 1 assessments since 4/2016
  - 11% or 34 Level 1 assessments are for community water systems.

RTCR Level 1 Assessment Large Systems <1000

# NEW ASSESSMENT FORMS!

**LEVEL 1 ASSESSMENT FORM**  
Public Water Systems Less than or Equal (≤)1000 Persons and Surface Water/Ground Water Under the Direct Influence (GUDI) of Surface Water Systems

The public water system owner, owner's designee, operator, or third party hired by the water system must complete and sign this form when a Level 1 Assessment is triggered per the Revised Total Coliform Rule (RTCR). For details on completing this form, please refer to separate instructions on our website at: <http://www.nj.gov/dep/watersupply/>. Provide details in adjacent spaces or on additional sheets as necessary. **Return the form within thirty (30) days** after learning your system exceeded a trigger to the mail or fax address above. Alternatively, return form by e-mail via [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov). **Failure to complete and submit this form in its entirety shall result in the issuance of a treatment technique violation.**

Public Water System ID#: NJ \_\_\_\_\_

Public Water System Name: \_\_\_\_\_

System Type:  Community Water System  Non-Transient Non-Community  Transient Non-Community

Month/Year of Treatment Technique Trigger: \_\_\_\_\_

Level 1 Trigger:  Confirmed TC+  
 TC+ with insufficient repeat samples

Letter #: \_\_\_\_\_

Certification: I certify under penalty of law that I am the person authorized to fill out this form, and the information contained herein is true, accurate and complete to the best of my knowledge and belief. I certify that I have filled out this form in its entirety, and failure to complete and submit this form will result in the issuance of a treatment technique violation.

Completed by:	Certification/License # (if applicable):
Signature*:	Date:
Email:	Phone#:

\*This must be signed and dated by the approved party or the assessment is considered incomplete and the system will incur a treatment technique violation per 40 CFR 141.860(b).

Water System Owner:

Name:	Date:	
Signature:	Contact Name:	Contact Email:
Contact Name:	Contact Email:	Contact Phone#:

1.1	Has there been any vandalism and/or unauthorized access to facilities?	<input type="checkbox"/> Yes <input type="checkbox"/> No	if yes, indicate findings and date:	
1.2	Have there been any interruptions to electrical power?	<input type="checkbox"/> Yes <input type="checkbox"/> No	if yes, indicate date and which components effected:	
1.3	Other comments on the general water system information including identification of performed corrective actions:			

2	Source	Description of Defect and Corrective Action Taken/Proposed	Date Corrected/Proposed	For official State use only**
2.1	Have any new/emergency/inactive sources recently been introduced into the system?	<input type="checkbox"/> Yes <input type="checkbox"/> No	if yes, indicate which source(s)?	
2.2	How many wells were in operation within 7 days prior to and/or during the sampling event?	Number: _____	Well Permit number(s):	
2.3	Are all the wells indicated included in the NJDEP's Drinking Water Watch website?			
2.4	Are there any abandoned wells nearby?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
2.5	Is there any visible damage to the wells?	<input type="checkbox"/> Yes <input type="checkbox"/> No	if yes, explain:	
2.6	Is the wellhead(s) flush to grade or under 12" above grade?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
2.7	Are well field(s) prone to flooding?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
2.8	Is there evidence of standing water near the wellhead(s)?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

RTCR Level 1 Assessment Large Systems <1000


11/2017

Page 1 of 8

RTCR Level 1 Assessment Large Systems <1000

11/2017

Page 2 of 8



## COMMON PROBLEMS WITH LEVEL 1 AND LEVEL 2 ASSESSMENT FORMS

- Failure to list corrective action and timelines
- Failure to answer all the questions
- No invoices, estimates or receipts
- No site visit date (**this is very important**)
- Signature date only

## NOTE!

Ideally, a well-performed Level 1 assessment will prevent most systems from developing conditions that lead to fecal contamination or a Level 2 assessment.

## RTCR – WHAT'S NEW



- Outreach to seasonal systems
  - *Plan to notify all seasonal systems (~400) of start-up requirements and will send out certification forms*
  - *Provide reference materials to State parks*

## RTCR – WHAT’S NEW SAMPLE PLAN REVIEWS



- BSDW Review of RTCR Sample Plans
  - *Focus on CWS*
  - *Started with 93 in house*
  - *Round 1 – called in 34 plans – nearly complete*
  - *Starting Round 2 – calling in another 30-40 plans*
- Checklist developed for water systems to use for RTCR sample plan submission
- Guidance for Developing a Sample Siting Plan  
<http://www.nj.gov/dep/watersupply/pdf/rtrcr-siting-plan-guidance-201601.pdf>

## RTCR SAMPLE PLANS FREQUENT ERRORS & TIPS FOR SUBMITTING



- Basic information not provided
  - *System contact, lab contact, source, storage, treatment, interconnections*
- Sample sites not provided
  - *Need to include routine, repeat, AND triggered source water sample sites*
  - *Routine sites need to be identified on distribution system map*
  - *If a routine site is at a dead end, need to provide alternate locations for repeat sample sites (Note: OK for both repeat locations to be upstream but a reason must be noted in the plan)*
- Sample schedule is not provided
  - *Samples should be collected at regular intervals throughout month*
  - *Samples to be distributed evenly and regularly across sampling locations*



## RTCR SAMPLE PLANS FREQUENT ERRORS & TIPS FOR SUBMITTING



- Distribution system map not provided
  - *At a minimum should contain locations of treatment plants, water sources, storage tanks, interconnections, and routine sampling sites*
- Sample sites are not representative of the system
  - *Not enough routine sampling locations*
  - *Sites should target vulnerable portions of the system including areas with high population density, longer hydraulic retention times (e.g., dead ends, storage tanks), and known trouble areas*
  - *Should be some rationale for selecting a site – we will view as deficient if no justification is provided and no obvious justification exists*

## LEAD & COPPER





## INTRODUCTION TO THE LEAD TEAM

- The Lead Team
  - *Made up of 13 staff members*
  - *Tasked with reviewing the sampling plans for every water system in the entire state, both community and NTNC*
- Over the last two years we have called in approximately 550 Lead and Copper Sampling Plans and 445 Water Quality Parameter Sampling Plans.
  - *Almost 100% have been found to be deficient!*
- There have been many different versions of templates, guidance and other supporting documents as we continue to learn what works best for the systems and the NJDEP



## SAMPLING PLAN TIMELINE

- October 2015 requested all large water systems submit their WQP Sampling Plans.
- July 2016 requested all large water system submit their PbCu Sampling Plans.
- August 2016 letter sent to all community and nontransient noncommunity water systems outlining next steps.
- All large water systems were placed back on standard lead and copper monitoring.



## SAMPLING PLAN TIMELINE

- November 2016 requested all small and medium systems with CCT and previous action level exceedance submit their PbCu and WQP Sampling Plans.
- January 2017 requested all small and medium systems with CCT and no previous action level exceedance submit their PbCu and WQP Sampling Plans.
- July 2017 requested all NTNCWS schools with CCT to submit their PbCu and WQP Sampling Plans.
- Requesting sampling plans as necessary (e.g. action level exceedance).
- Other systems received a letter in November 2017.



## SUMMARY AND COMMON DEFICIENCIES

- As of 2/28/18 – 229 Approved Lead & Copper and 190 Approved WQP Sampling Plans
- Common issues:
  - *Thorough materials evaluation (i.e. not just the sites sampled in the past)*
  - *Sampling from the highest Tier*
  - *Correct sample protocols/sampling instructions*
  - *Location of Lead Service Lines (Or how is the system working to identify where they are located)*
- Sampling plan templates and guidance are available at <http://www.nj.gov/dep/watersupply/dwc-lead-public.html> We strongly recommend they use the templates.

## NOTE!



- On January 22, 2018 we sent a letter to those systems that we have not called in their plans to date strongly recommending them to begin conducting their materials evaluation now and develop a detailed and correct sampling pool.
- A date has not been set when NJDEP will call in the next set; however, if a system incurs an ALE their plan is due within 30 days.

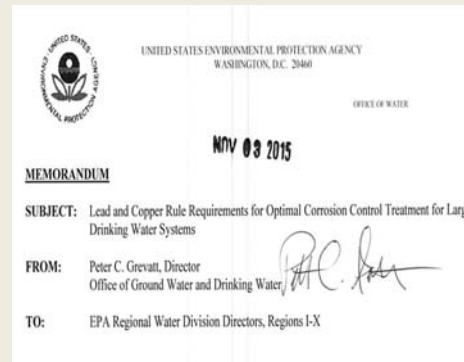
LEAD & COPPER  
MOVING FORWARD





## CHANGES IN SOURCE AND TREATMENT

*“Due to the unique characteristics of each PWS it is critical that public water systems, in conjunction with their primacy agencies and, if necessary, outside technical consultants, evaluate and address potential impacts resulting from treatment and/or source water changes.”*



## CHANGES IN SOURCE AND TREATMENT

- CCT Recommendation due following any action level exceedance or proposed treatment/source change that may affect water corrosivity.
- EPA: Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems  
<https://www.epa.gov/dwreginfo/optimal-corrosion-control-treatment-evaluation-technical-recommendations>
- CCT Recommendations and setting of WQP minimums (Optimal) have been transferred to Engineering under Bureau of Water System Engineering.



## NEXT STEPS & LESSONS LEARNED

- Systems may be placed back on standard lead and copper monitoring
- No systems being placed on Triennial monitoring at this time
- Compliance will be run on all requirements
  - *Violations will be issued*
- Continuing to develop guidance as needed
- Training Presentations Now Available Online
- Licensed Operator issues

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## EPA LONG-TERM REVISIONS

- EPA is considering Long-Term revisions to improve public health protection by making substantive changes and to streamline the rule requirements.
- Key Principles for LCR Revisions:
  - *Focus on Minimizing Exposure to Lead in Drinking Water*
  - *Clear and Enforceable Requirements*
  - *Transparency*
  - *Environmental Justice and Children's Health*
  - *Integrating Drinking Water with Cross-Media Lead Reduction Efforts*





QUESTIONS?