

Lead and Copper Rule Revision

Primacy in Idaho

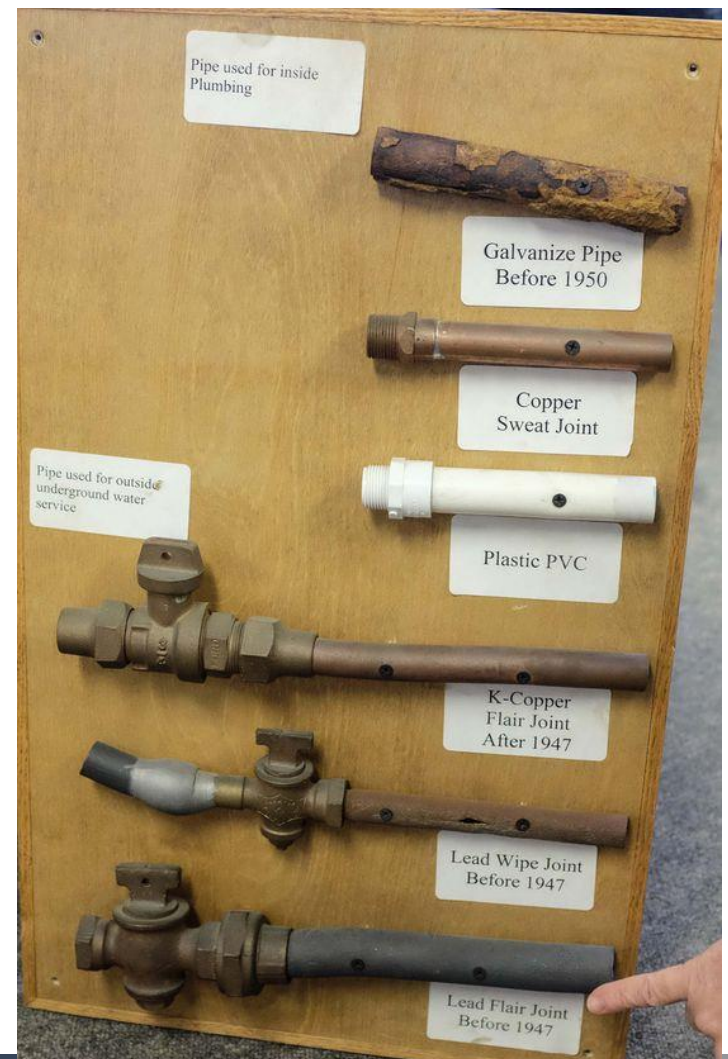


STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Cassandra Lemmons, CPM, MBA, REHS
Drinking Water Compliance &
Enforcement Supervisor

Agenda

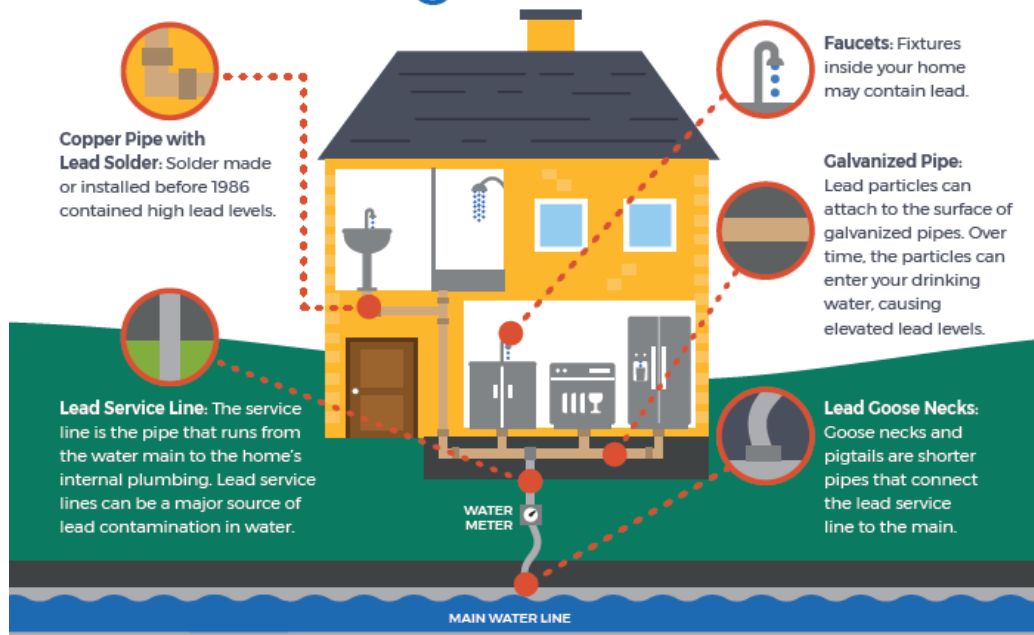
- Idaho Primacy
- Compliance tools
- Key rule components
 - Increased PN
 - Replacement Plans
 - School CC sampling
 - Site selection & Monitoring
 - WQP Monitoring
 - Corrosion Control – Briefly
 - Small System Flexibility
 - Find-and-Fix



Why?

- **NO MCL = NO SAFE LEVELS**
- Effects
 - Chronic
 - More exposure = more damage
 - Heart, brain, kidney, liver
 - Stored in bones
 - Children absorb 4-5 times more than adults
 - Decreased IQ
 - Coma, convulsions, death

Sources of **LEAD** in Drinking Water



Primacy Rule Impact in Idaho

- Why primacy?
- Idaho's team
- 1009 systems
 - 8 Large
 - 20 Medium
 - 982 Small and VSWS



PWS Switchboard



IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY



Public Water System Switchboard

Visit our [COVID-19 and Drinking Water](#) web page for information about the coronavirus.

Rules / Guidance	Tools / Data	Forms / Information	System Class / Licensing	Capacity Development
Drinking Water Rules IDAPA 58.01.08	CCR Report Tool	Change Water System Information	Operator Resources - Licensing Information	Capacity Development
40 CFR 141	Certified Drinking Water Labs	Emergency Preparedness IDWARN	Should Your Facility be a Regulated PWS?	Grants and Loans
Contaminants and Compliance Information	How to Sample Videos	Important Dates	System Classification / Supervision Requirements	Operation and Maintenance
Cross-Connection Control	Lab Forms	Plans and Specifications		Pay Assessment Fee Online



PWS Switchboard



Rules / Guidance	Tools / Data
Revised Total Coliform Rule (RTCR) (including E coli)	Sample Results
L&C Button	SMART Financial Tool

Official Government Website English Public Records Request Contact Us

IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY

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Cross-Connection Control	Lab Forms	Plans and Specifications		Pay Assessment Fee Online

Toolkit

Actions			
 		Lead Service Line Inventory short informational video	
 		Lead Water Service Line Survey form	
 		Lead service line inventory - door hanger (4 x 11)	
 		Lead service line inventory - postcard (9 x 6 editable)	
 		Lead service line inventory - social media graphic Instagram (square 1080)	
 		Lead service line inventory - social media graphic Story (1080 x 1920)	
 		Lead service line survey - postcard (6 x4 editable)	
 		Lead service line survey - social media graphic Facebook (1200 x 630)	
 		Official Service Line Inventory for Idaho Public Drinking Water Systems (with more than 34,000 service lines)	
 		Official Service Line Inventory for Idaho Public Drinking Water Systems (with up to 34,000 service lines)	

Toolkit

- Toolkit



Additional Resources

- [Lead Service Line Inventory Portal – Submit inventories here](#)
- [Lead Service Line Inventory – Toolkit for Public Water Systems](#)

Video:



Service Line Inventory template

Official Service Line Inventory for Idaho Public Drinking Water Systems



WATER SYSTEM INFORMATION

PWS ID #:

PWS Name:

Service Line Ownership:

Date of Inventory:

PWS Contact Information:

Name:

Title:

Phone:

Email:

PWS ID

This is your unique public water system number. It always begins with ID.

Inventory submittal

Submittal:



Protecting Public Health and the Environment

IDAHO Department of Environmental Quality Service Line Inventories

Service Line Inventories - Home

Welcome to the service line inventory submittal website. To submit an inventory, select your Public Water System and logon.

Public Water System Search:

Water System Number:

Water System Name:

Example: ID3140022

Search Results: *(Click on the PWS Number)*

Inventories Submittal

Verify Connections

PWS: ID5420058 - TWIN FALLS CITY OF
Jurisdiction: TWIN FALLS REGIONAL OFFICE

Step #1: Verify the number of service connections for this Public Water System.

Number of Connections: 19500

Is this the correct number of Service Connections for this Public Water System? Yes No

Contact your [Compliance Officer](#) with any questions.

Next

Cancel

Inventories Submittal

Upload Inventory

PWS: ID5420058 - TWIN FALLS CITY OF
Jurisdiction: TWIN FALLS REGIONAL OFFICE

Step #2:
Click on 'Choose File' to upload your inventory.
If you have not completed an inventory, click [here](#) for the inventory template.

For more details on inventory requirements, or if you need guidance, click this [Help](#) link.



Inventory: No file chosen
Only Microsoft Excel files (.xlsx) are accepted by the Service Line Portal.

Submitted By:
Phone Number: (Format: 111-222-3333)
Email Address:

Submittal confirmation and status update changes will be sent to the email address above.

Contact your [Compliance Officer](#) with any questions.

(Testing) Service Line Inventory Submitted

 Service Line Inventories <DO_NOT_REPLY@deq.idaho.gov>
To  Curtis Stoehr

[Reply](#) [Reply All](#) [Forward](#) [More](#)



Thu 2/8/2024 3:44 PM

This email confirms that you have submitted your Lead Service Line Inventory to DEQ. Please retain a copy of this email for your records. A DEQ compliance officer will review your submission and reach out if any issues require your attention. If everything is complete your compliance officer will mark the submitted inventory as approved. If a problem is noted, the compliance officer will contact you.

A Service Line Inventory was submitted to DEQ on behalf of:
PWS Number: ID3140022
PWS Name: COUNTRY CLUB SUBDIVISIONS WATER ASSN
Submitted by: Curtis Stoehr
Date Submitted: 2/8/2024

Attachments:
1) ID3140022_Idaho DEQ LSLI template FINAL 10.2022.xlsx

(Testing) Service Line Inventory Rejected

 Service Line Inventories <DO_NOT_REPLY@deq.idaho.gov>
To  Curtis Stoehr

The following Service Line Inventory has been rejected by your DEQ compliance officer.

PWS Number: ID3140022
PWS Name: COUNTRY CLUB SUBDIVISIONS WATER ASSN
Submitted by: Curtis Stoehr
Date Submitted: 2/8/2024

Attachments:
1) ID3140022_Idaho DEQ LSLI template FINAL 10.2022.xlsx

This inventory was rejected for the following reason(s):

1. Testing.

Inventories: Compliance review

ID4010222 - EAGLE, CITY OF (WESTERN ZONE)

Jurisdiction: Boise Regional Office
Date Submitted: 03/06/24
Uploaded By: Kenley Hinrichs
Email Address: kjhbrr@gmail.com
Phone Number: 111-222-3333

Status: Under Review

Complete all items on the following checklist:

1. Verify Number of Service Connections:

Service Connections in SDWIS: 1936 *The PWS agreed with this number when they uploaded their inventory.*

2. Download, open, and review, the PWS's Service Line Inventory: [Help](#)

(2a) Download Inventory: [ID4010222_Idaho DEQ LSLI template_shortened 500.xlsx](#)

(2b) Determine if the downloaded inventory is on the proper template.

If the inventory is not on the correct template, scroll down and choose "Reject" at the bottom of this page.

(2c) Review the following contained in the downloaded inventory:

"Summary Information"

- Water System Information
- PWS Contact Information
- Inventory Availability
- Inventory Summary

"Inventory Sheet"

- Make sure the "Inventory Sheet" has been completed based on the guidelines provided in the "Instructions" tab. *"Reject" if not.*

Inventories: Compliance review

3. Enter or update Service Line Inventory numbers in “SDWIS Bridge, LCRR LSL Inventory”:

For detailed instructions, click [Help](#)

4. Evaluate the accuracy of the LCRR Compliance Schedule in SDWIS:

For detailed instructions click [Help](#)

- (4a) Close the LCRR Compliance Schedule.

- (4b) Add a new Compliance Schedule or add a LCRR Water system Indicator

If the system reported any lead, GRR, or unknown service lines, create a new LCRR Compliance Schedule to report updated inventory.
OR

If the system only reported Non-Lead service lines, add a LCRR Water System Indicator to the Public Water System's Indicators in SDWIS.

5. Upload the System's submitted Service Line Inventory into EDMS:

Use the appropriate naming convention: ex. “ID1234567 ANYTOWN CITY OF - Service Line Inventory 2024” [Help](#)

Notes:

All notes will be included in the email sent to the PWS if the Inventory is rejected. *You will be required to add a Note if the Inventory is rejected.*

Reject

Check for Errors

Cancel

Inventories: Compliance review

Check for Errors

ID4010222 - EAGLE, CITY OF (WESTERN ZONE)

Jurisdiction: BOISE REGIONAL OFFICE

Total Errors: 2

Inventory cannot be approved due to QA/QC Errors.

1. Number of Service Connection Issues:

2. Checklist Items Not Completed

None

3. QA/QC Reports

Level	Report Name	Count
4E	LSLI - Pending Compliance Schedule Activities Missing Achieved Date(s)	2
Total Errors:		2

[Back to Inventory Review](#)

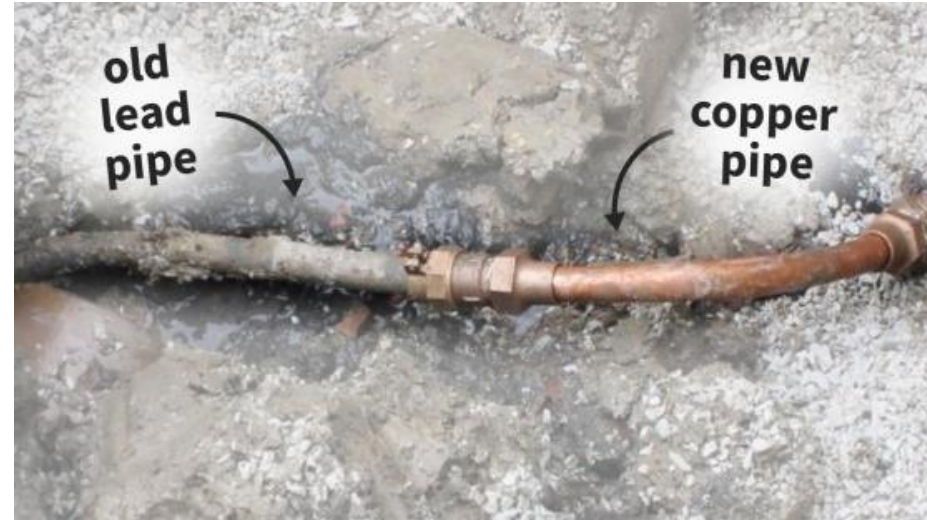
Training for PWS

- Statewide Training workshops
 - 6-hour in-person with CEUs
 - April and May 2024 (DEQ staff only)
 - 4 already held
 - May 9 – Twin Falls
 - May 31 – Idaho Falls



Increased PN

- Tier 1 PN for LALE with updated health effects language
- Service Line materials notice
 - Due 30 days after inventory
 - LSL, GRR and Unknown
 - 3 templates



Replacement Plan

- Not required if all service lines are non-lead
- Must include specific elements
- Idaho Guidance and template pending



School & CC sampling

- Annual notice
 - Lead health effects (also to secondary schools)
 - Monitoring requirements
 - Proposed schedule
 - 3T's



School & CC sampling

- Sample 20% annually
- New sampling procedures
- 5 samples per school
- 2 samples per CC



Site selection & Monitoring

- New tiers, new sites, new paperwork
 - Tier 1 = SF w/LSL*
 - Tier 2 = Buildings w/ LSL
 - Tier 3 = GRR**
 - Tier 4 = Copper w/ lead solder before State lead ban
 - Tier 5 = Representative
- Return to Std monitoring
- ***Cold water kitchen or bathroom sink tap only***



******If system allows residents to sample, cannot challenge results based alleged on sampling errors***

Standard WQP Monitoring

- All large systems
- Med/small with LALE
- Med Small w/ CCT and LTLE
- pH & alkalinity
 - Representative sites
 - 2 samples per site
 - Include sites on LCRR sample site selection plan

System size (number people served)	Min. sites
>100,000	25
10,001-100,000	10
3,301-10,000	3
501-3,300	2
101-500	1
≤ 100	1

Corrosion Control & Action levels

- Treatment Technique
 - Required for all systems
 - Requirements differ by size and status
 - Demonstrated in 2 basic ways
 - Install CCT
 - Results below LTL, LAL and CAL
 - CCT Steps – 2 parts
 - Recommendation
 - Study



Corrosion Control Steps

When to start CCT process

Large Systems (>50,000)

With Treatment: Exceed LTL or CAL

W/O Treatment: Exceed lead PQL or CAL

Medium Systems (10,000 and $\leq 50,000$)

With Treatment: Exceed LTL or CAL

W/O Treatment

Exceed LAL or CAL

Exceed LTL: submit recommendation

Then if system exceeds LAL or CAL
implement remaining steps



Corrosion Control Steps

When to start CCT process

Small Systems ($\leq 10,000$)

- Includes small Community and NTNC systems
 - With Treatment: Exceed LTL, LAL, or CAL
 - W/O Treatment: Exceed LAL or CAL



CCT Studies: Simplified

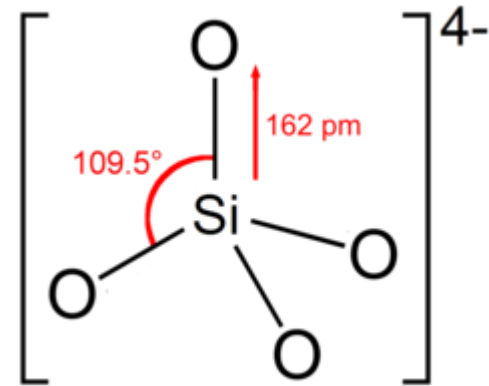
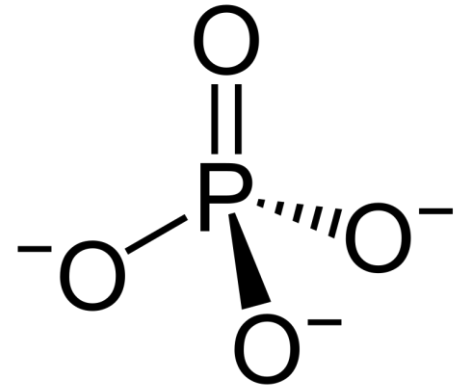
4 engineering evaluations:

- alkalinity and pH adjustments
- Addition of orthophosphate- or silicate-based inhibitors
- Addition of orthophosphate to maintain residual of 1 mg/L and 3 mg/L (2 studies)

Evaluation includes:

- Sampling before and after study
 - Lead and copper
 - pH and alkalinity
 - Orthophosphate and/or silicate when used
- Pipe rig/loop, metal coupon test, partial system tests
- Supporting data
- All constraints, adverse effects

Recommendation of best option



Small Systems options: §141.93

- LTLE: Choose compliance option w/in 6 months of end of tap sampling period
 - LSLR program to be completed w/in 15 yrs.
 - CCT
 - POU devices***
 - Replace all lead plumbing within 1 yr (NTNC w/ full control)
- LALE after LTLE: Implement compliance option
- LALE, no LTLE: Choose and implement compliance option



Find-and-Fix Assessment



- For tap sample sites that exceed LAL
- 8 Steps
 1. CCT Assessment – New WQP samples w/in 5 days of results
Small systems w/o CCT may have up to 14 days
 2. Site Assessment – Follow-up tap sampling at exceedance sites w/in 30 days
 3. Assess monitoring results
 4. State approves or specifies different approach
 5. System adjusts or installs CCT
 6. Adjustment of OCCT and follow-up sampling w/in 12 months of Step 5
 7. State review of CCT modifications
 8. System operating in accordance with OCCT

Questions?

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