

CEE/EHS 597B

Class #8:
Regulations, Sampling and Reporting

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Regulations

- Pathogens: treatment technique & surrogates
 - CT
 - Coliforms
 - Turbidity
- Chemicals: MCLs
 - Pb/Cu
 - Fe/Mn
 - DBPs: THMs & HAAs
 - Nitrate/Nitrite
 - Others: VOCs, radioactives, perchlorate, sodium, fluoride, asbestos

Current SDWA regulations

- ❖ Total trihalomethanes (TTHMs);
- ❖ Chemical rules (Phases I, II, IIb, and V);
- ❖ Surface water treatment rule (SWTR);
- ❖ Total coliform rule (TCR);
- ❖ Lead and copper rule (LCR);
- ❖ Stage 1 disinfectants/disinfection byproducts rule (Stage 1 DBPR);
- ❖ Interim enhanced surface water treatment rule (IESWTR);
- ❖ Radionuclides;
- ❖ Consumer Confidence Report rule;
- ❖ Arsenic;
- ❖ Filter Backwash Recycling Rule; and
- ❖ Long Term 1 Enhanced Surface Water Treatment Ru

Chemical Rules

- **Phase I, II, Iib, and V.** MCLs found in 40 CFR 141.61-.62.
 - The **Phase I Rule** (1987) 8 **volatile organic chemicals (VOCs)**. The **Phase II and Iib Rules** (both published in 1991) updated or created MCLs for 38 contaminants. The **Phase V Rule** (published in 1992) set standards for 23 more contaminants.
- **Contaminants**
 - Inorganic chemicals (IOCs) such as heavy metals and oxyanions
 - **Synthetic organic chemicals (SOCs)** such as pesticides.
 - Additional VOCs.
- All pose chronic health risks.
 - **nitrate** and **nitrite** also pose acute health risks, (limit the blood's ability to carry oxygen) s.

“Bacteriological Analysis”

- Generally refers to the analysis of coliform organisms
- Coliform analysis and the total coliform rule is one of several ways we protect the public from waterborne disease agents
 - The coliforms are “surrogates” for possible fecal contamination and presence of human pathogens
 - Pathogens, themselves are very difficult to measure
- Another way is through treatment techniques (TT) and required operational performance measures

Revised Total Coliform Rule (RTCR)

- Purpose: to reduce the risk of waterborne pathogens
 - bacteria, viruses & protozoa
- Implementation: April 1, 2016
- Sampling and Testing
 - **Routine**: total coliforms, and if positive (TC+), E. coli
 - **Repeat** (follow-up, if TC+) 3 more samples within 24 hrs for TC and, if TC+, also EC
- The next step: assessment report to DEP within 30 days
 - Level 1 assessment: done by the PWS
 - trigger: 2 TC+ samples in a month, or failure to do repeat sampling
 - Level 2 assessment: done by a consultant
 - trigger: EC MCL violation, or two level 1 assessments within 1 yr

Number/frequency of samples

- Collected from sites representative of distribution system
- For community water systems:
 - From 1/month up to 480/month
 - Reduced frequency for ≤ 1000 is 1 per quarter
- MCL for coliforms (per month):
 - >1 TC+, if collecting ≤ 40 samples
 - Otherwise detection in $>5\%$ of samples

| Population | # samples /month |
|---------------|------------------|
| $\leq 1,000$ | 1 |
| 1,001 – 2,500 | 2 |
| 2,501 - 3,300 | 3 |
| 3,301 – 4,100 | 4 |
| 4,101 – 4,900 | 5 |
| 4,901 – 5,800 | 6 |
| 5,801 - 6,700 | 7 |
| 6,701 – 7,600 | 8 |
| 7,601 – 8,500 | 9 |

Log Removal

- **Meaning of “Log Removal or Inactivation”**
 - **Removal:** remove organisms from the water
 - **Inactivation:** make organisms non-infectious by use of disinfection
 - Let N_0 be the number concentration of microorganisms in raw water
 - Let N be the number concentration of microorganisms after treatment
 - N/N_0 = fraction remaining after treatment
 - $100 \times (N_0 - N)/N_0$ = percent removal (or inactivation)
 - $\text{Log}(N_0/N)$ = the log removal (or inactivation)
 - Relation between % removal and log removal:

| % Removal | Log Removal | N, if $N_0 = 10,000/L$ |
|------------------|--------------------|--|
| 90 | 1 | 1000 |
| 99 | 2 | 100 |
| 99.9 | 3 | 10 |
| 99.99 | 4 | 1 |

SWTR (cont.)

- Requirements for Filtered Supplies

- ≤ 0.5 NTU ($\geq 95\%$ of samples) combined filter effluent; ≤ 5 NTU always
- ≥ 0.2 mg/L residual at EPTDS; detectable in $\geq 95\%$ of samples

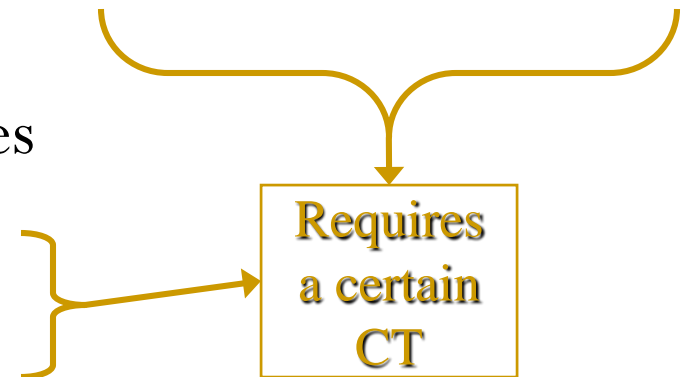
Earned removal credit



| Type of Filtration | Log ₁₀ Removal Allowed By Filtration | | Remaining Log ₁₀ Inactivation by Disinfection | |
|--------------------|---|---------|--|---------|
| | <i>Giardia</i> | Viruses | <i>Giardia</i> | Viruses |
| Conventional | 2.5 | 2.0 | 0.5 | 2.0 |
| Direct | 2.0 | 1.0 | 1.0 | 3.0 |

- Requirements for Unfiltered Supplies

- Meet source water quality criteria
- Provide all Pathogen removal by Disinfection
 - 3 log *Giardia*, 4 log viruses



CT for Giardia & Free Chlorine

Table C-1. CT Values for Inactivation of *Giardia* Cysts by Free Chlorine at 0.5°C or Lower

| CHLORINE CONCENTRATION (mg/L) | pH<=6 Log Inactivation | | | | | | pH=6.5 Log Inactivation | | | | | | pH=7.0 Log Inactivation | | | | | | pH=7.5 Log Inactivation | | | | | |
|-------------------------------|------------------------|-----|-----|-----|-----|-----|-------------------------|-----|-----|-----|-----|-----|-------------------------|-----|-----|-----|-----|-----|-------------------------|-----|-----|-----|-----|-----|
| | 0.5 | 1.0 | 1.5 | 2.0 | 2.5 | 3.0 | 0.5 | 1.0 | 1.5 | 2.0 | 2.5 | 3.0 | 0.5 | 1.0 | 1.5 | 2.0 | 2.5 | 3.0 | 0.5 | 1.0 | 1.5 | 2.0 | 2.5 | 3.0 |
| <=0.4 | 23 | 46 | 69 | 91 | 114 | 137 | 27 | 54 | 82 | 109 | 136 | 163 | 33 | 65 | 98 | 130 | 163 | 195 | 40 | 79 | 119 | 158 | 198 | 237 |
| 0.6 | 24 | 47 | 71 | 94 | 118 | 141 | 28 | 56 | 84 | 112 | 140 | 169 | 33 | 67 | 100 | 133 | 167 | 200 | 40 | 80 | 120 | 159 | 199 | 239 |
| 0.8 | 24 | 48 | 73 | 97 | 121 | 145 | 29 | 57 | 86 | 115 | 143 | 172 | 34 | 68 | 103 | 137 | 171 | 205 | 41 | 82 | 123 | 164 | 205 | 246 |
| 1 | 25 | 49 | 74 | 99 | 123 | 148 | 29 | 59 | 88 | 117 | 147 | 176 | 35 | 70 | 105 | 140 | 175 | 210 | 42 | 84 | 127 | 169 | 211 | 253 |
| 1.2 | 25 | 51 | 76 | 101 | 127 | 152 | 30 | 60 | 90 | 120 | 150 | 180 | 36 | 72 | 108 | 143 | 179 | 215 | 43 | 86 | 130 | 173 | 216 | 259 |
| 1.4 | 26 | 52 | 78 | 103 | 129 | 155 | 31 | 61 | 92 | 123 | 153 | 184 | 37 | 74 | 111 | 147 | 184 | 221 | 44 | 89 | 133 | 177 | 222 | 266 |
| 1.6 | 26 | 52 | 79 | 105 | 131 | 157 | 32 | 63 | 95 | 126 | 155 | 189 | 38 | 75 | 113 | 151 | 188 | 226 | 46 | 91 | 137 | 182 | 228 | 273 |
| 1.8 | 27 | 54 | 81 | 108 | 135 | 162 | 32 | 64 | 97 | 129 | 161 | 193 | 39 | 77 | 116 | 154 | 193 | 231 | 47 | 93 | 140 | 186 | 233 | 279 |
| 2 | 28 | 55 | 83 | 110 | 138 | 165 | 33 | 66 | 99 | 131 | 164 | 197 | 39 | 79 | 118 | 157 | 197 | 236 | 48 | 95 | 143 | 191 | 238 | 286 |
| 2.2 | 28 | 56 | 85 | 113 | 141 | 169 | 34 | 67 | 101 | 134 | 169 | 201 | 40 | 81 | 121 | 161 | 202 | 242 | 50 | 99 | 149 | 198 | 248 | 297 |
| 2.4 | 29 | 57 | 86 | 115 | 143 | 172 | 34 | 68 | 103 | 137 | 171 | 205 | 41 | 82 | 124 | 165 | 206 | 247 | 50 | 99 | 149 | 199 | 248 | 298 |
| 2.6 | 29 | 58 | 88 | 117 | 146 | 175 | 35 | 70 | 105 | 139 | 174 | 209 | 42 | 84 | 126 | 168 | 210 | 252 | 51 | 101 | 152 | 203 | 253 | 304 |
| 2.8 | 30 | 59 | 89 | 119 | 148 | 178 | 36 | 71 | 107 | 142 | 178 | 213 | 43 | 86 | 129 | 171 | 214 | 257 | 52 | 103 | 155 | 207 | 258 | 310 |
| 3 | 30 | 60 | 91 | 121 | 151 | 181 | 36 | 72 | 109 | 145 | 181 | 217 | 44 | 87 | 131 | 174 | 218 | 261 | 53 | 105 | 158 | 211 | 263 | 316 |

| CHLORINE CONCENTRATION (mg/L) | pH=8.0 Log Inactivation | | | | | | pH=8.5 Log Inactivation | | | | | | pH=9.0 Log Inactivation | | | | | |
|-------------------------------|-------------------------|-----|-----|-----|-----|-----|-------------------------|-----|-----|-----|-----|-----|-------------------------|-----|-----|-----|-----|-----|
| | 0.5 | 1.0 | 1.5 | 2.0 | 2.5 | 3.0 | 0.5 | 1.0 | 1.5 | 2.0 | 2.5 | 3.0 | 0.5 | 1.0 | 1.5 | 2.0 | 2.5 | 3.0 |
| <=0.4 | 46 | 92 | 139 | 185 | 231 | 277 | 55 | 110 | 165 | 219 | 274 | 329 | 65 | 130 | 195 | 260 | 325 | 390 |
| 0.6 | 48 | 95 | 143 | 191 | 238 | 286 | 57 | 114 | 171 | 228 | 285 | 342 | 68 | 136 | 204 | 271 | 339 | 407 |
| 0.8 | 49 | 98 | 148 | 197 | 246 | 295 | 59 | 113 | 177 | 236 | 295 | 354 | 70 | 141 | 211 | 281 | 352 | 422 |
| 1 | 51 | 101 | 152 | 203 | 253 | 304 | 61 | 122 | 183 | 243 | 304 | 365 | 73 | 146 | 219 | 291 | 364 | 437 |
| 1.2 | 52 | 104 | 157 | 209 | 261 | 313 | 63 | 125 | 188 | 251 | 313 | 376 | 75 | 150 | 226 | 301 | 376 | 451 |
| 1.4 | 54 | 107 | 161 | 214 | 268 | 321 | 65 | 129 | 194 | 258 | 323 | 387 | 77 | 155 | 232 | 309 | 387 | 464 |
| 1.6 | 55 | 110 | 165 | 219 | 274 | 329 | 66 | 132 | 199 | 265 | 331 | 397 | 80 | 159 | 239 | 318 | 398 | 477 |
| 1.8 | 56 | 113 | 169 | 225 | 282 | 338 | 68 | 136 | 204 | 271 | 339 | 407 | 82 | 163 | 245 | 326 | 408 | 489 |
| 2 | 55 | 115 | 173 | 231 | 288 | 346 | 70 | 139 | 209 | 278 | 348 | 417 | 83 | 167 | 250 | 333 | 417 | 500 |
| 2.2 | 59 | 118 | 177 | 235 | 294 | 353 | 71 | 142 | 213 | 284 | 355 | 426 | 85 | 170 | 256 | 341 | 426 | 511 |
| 2.4 | 60 | 120 | 181 | 241 | 301 | 361 | 73 | 145 | 218 | 290 | 363 | 435 | 87 | 174 | 261 | 348 | 435 | 522 |
| 2.6 | 61 | 123 | 184 | 245 | 307 | 368 | 74 | 148 | 222 | 296 | 370 | 444 | 89 | 178 | 267 | 355 | 444 | 533 |
| 2.8 | 63 | 125 | 188 | 250 | 313 | 375 | 75 | 151 | 226 | 301 | 377 | 452 | 91 | 181 | 272 | 362 | 453 | 543 |
| 3 | 64 | 127 | 191 | 255 | 318 | 382 | 77 | 153 | 230 | 307 | 383 | 460 | 92 | 184 | 276 | 369 | 460 | 552 |

Portions of H&H Table 7-4 are extracted from this table

Source: EPA, 1999, Guidance Manual for Disinfection Profiling & Benchmarking

Source: AWWA, 1991.

Ct values for *Giardia lamblia* cysts

H&H, Table 7-4, pg.245

| | PH | LOG INACTIVATION | WATER TEMPERATURE | | | | |
|-------------------------------|-----|---------------------|-------------------------|-----------------------|------------------------|------------------------|------------------------|
| | | | 0.5°C [(mg/l) · min] | 5°C [(mg/l) · min] | 10°C [(mg/l) · min] | 15°C [(mg/l) · min] | 20°C [(mg/l) · min] |
| Free chlorine ^a | 6 | 0.5 | 25 | 18 | 13 | 9 | 7 |
| | 6 | 1.0 | 49 | 35 | 26 | 18 | 13 |
| | 7 | 0.5 | 35 | 25 | 19 | 13 | 9 |
| | 7 | 1.0 | 70 | 50 | 37 | 25 | 18 |
| | 8 | 0.5 | 51 | 36 | 27 | 18 | 14 |
| | 8 | 1.0 | 101 | 72 | 54 | 36 | 27 |
| Preformed chloramine | 6-9 | 0.5 | 640 | 370 | 310 | 250 | 190 |
| | 6-9 | 1.0 | 1300 | 740 | 620 | 500 | 370 |
| Chloride dioxide | 6-9 | 0.5 | 10 | 4.3 | 4.0 | 3.2 | 2.5 |
| | 6-9 | 1.0 | 21 | 8.7 | 7.7 | 6.3 | 5.0 |
| Ozone | 6-9 | 0.5 | 0.48 | 0.32 | 0.23 | 0.16 | 0.12 |
| | 6-9 | 1.0 | 0.97 | 0.63 | 0.48 | 0.32 | 0.24 |

^aFree chlorine values are based on a residual of 1.0 mg/l.

Ct values for Viruses

- For Viruses at various temperatures
 - pH 6-9

H&H Table 7-5, pg 245

| | LOG INACTIVATION | WATER TEMPERATURE | | | | |
|----------------------|---------------------|-------------------------|-----------------------|------------------------|------------------------|------------------------|
| | | 0.5°C [(mg/l) · min] | 5°C [(mg/l) · min] | 10°C [(mg/l) · min] | 15°C [(mg/l) · min] | 20°C [(mg/l) · min] |
| Free chlorine | 2.0 | 6 | 4 | 3 | 2 | 1 |
| | 3.0 | 9 | 6 | 4 | 3 | 2 |
| | 4.0 | 12 | 8 | 6 | 4 | 3 |
| Preformed chloramine | 2.0 | 1200 | 860 | 640 | 430 | 320 |
| | 3.0 | 2100 | 1400 | 1100 | 710 | 530 |
| Chlorine dioxide | 2.0 | 8.4 | 5.6 | 4.2 | 2.8 | 2.1 |
| | 3.0 | 25.6 | 17.1 | 12.8 | 8.6 | 6.4 |
| Ozone | 2.0 | 0.9 | 0.6 | 0.5 | 0.3 | 0.2 |
| | 3.0 | 1.4 | 0.9 | 0.8 | 0.5 | 0.4 |

Source: Adapted from *Guidance Manual for Compliance with the Filtration and Disinfection Requirements for Public Water Systems Using Surface Water Sources*. U.S. Environmental Protection Agency.

SWTR (cont.)

- Requirements for Filtered Supplies

- ≤ 0.5 NTU ($\geq 95\%$ of samples) combined filter effluent; ≤ 5 NTU always
- ≥ 0.2 mg/L residual at EPTDS; detectable in $\geq 95\%$ of samples

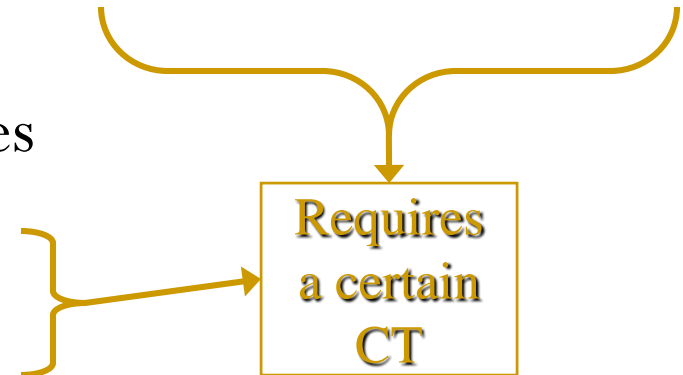
Earned removal credit



| Type of Filtration | Log ₁₀ Removal Allowed By Filtration | | Remaining Log ₁₀ Inactivation by Disinfection | |
|--------------------|---|---------|--|---------|
| | <i>Giardia</i> | Viruses | <i>Giardia</i> | Viruses |
| Conventional | 2.5 | 2.0 | 0.5 | 2.0 |
| Direct | 2.0 | 1.0 | 1.0 | 3.0 |

- Requirements for Unfiltered Supplies

- Meet source water quality criteria
- Provide all Pathogen removal by Disinfection
 - 3 log *Giardia*, 4 log viruses



The “Enhancement”

- But then we learned about
Crypto



- solution: The Enhanced SWTR
 - Long Term 1 ESWTR
 - Long Term 2 ESWTR

LT1ESWTR

- Water Quality Provisions of the LT1ESWTR
 - Removal Criteria for Overall Treatment (like SWTR)
 - 99 percent (2 log) for *Crypto* in addition to:
 - 99.9 percent (3 log) for *Giardia*
 - 99.99 percent (4 log) for viruses
 - removal is from last untreated surface water input to first customer
 - Tighter turbidity standards and filtration performance criteria
 - ≤ 0.3 NTU ($\geq 95\%$ of samples) combined filter effluent
 - ≤ 1 NTU always
 - Turbidity monitoring for individual filters, in addition to combined FE
 - Intended to assure good *Crypto* removal

Became WQ based
with LT2ESWTR

LT2ESWTR

- Large & medium conventional SW plants (> 10,000)
 - Source water Quality based
 - Monitor Source Water *Crypto* monthly for 24 months
 - 3 log *Crypto* removal required of all
 - Additional Treatment requirements based on highest 12 month average *Crypto* in source water (add 0.5 log in bins 1-3 for direct filtration systems)

| <u>Bin</u> | <u>Crypto</u> | <u>Additional Requirements</u> | <u># NE Systems</u> |
|------------|---------------|--|---------------------|
| 1 | <0.075/L | None | 110 |
| 2 | 0.075-1.0/L | 1.0 log | 2 |
| 3 | 1.0-3.0/L | 2.0 log (w/ ≥1 log inactivation, etc.) | 0 |
| 4 | ≥3.0/L | 2.5 log (w/ ≥1 log inactivation, etc.) | 0 |

- Treatment/Management credits - many “tools”, a few examples:

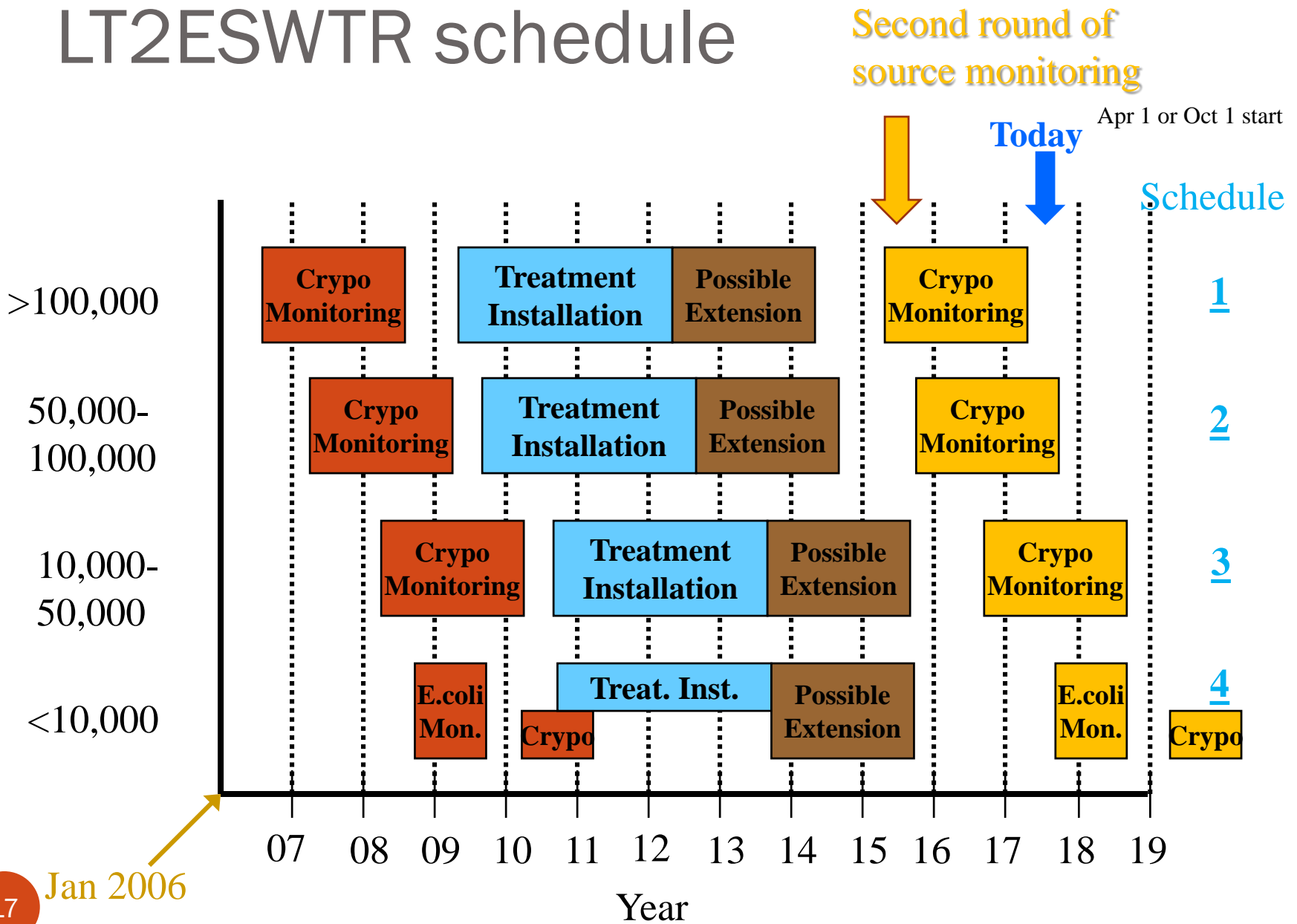
- Watershed Control Program, pre-sed with coag, 2nd stage filtr.: 0.5 log
- Filtration: 1.0 log (≤0.15 NTU for individual filters, 95% of time)
- Disinfection/membranes: 0.5->2.5 log
 - etc = membranes, bank filtration, cartridges



Schedule 1-3 only

None of the MA schedule 4 systems have triggered crypto monitoring

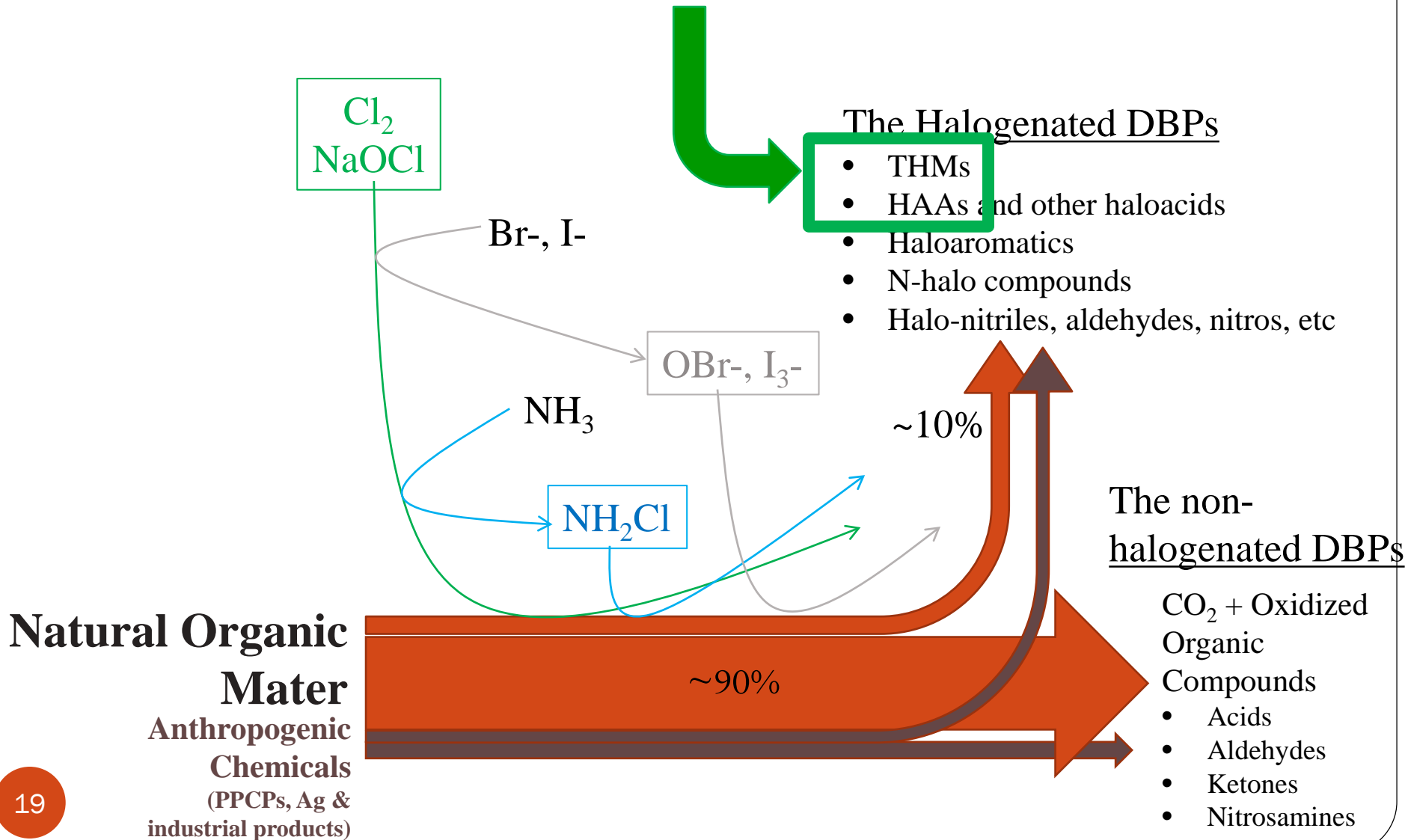
LT2ESWTR schedule



LT2ESWTR

- Small Systems (<10,000)
 - Same treatment requirements, but reduced monitoring
 - Twice per month *Crypto* sampling for 12 months, if system exceeds *E. Coli* trigger level (below)
 - Mean >10/100 mL for lakes/reservoirs
 - Mean > 50/100 mL for flowing streams
- Unfiltered Systems
 - *Crypto* inactivation required for all
 - 4 log virus
 - 3 log *giardia*
 - 2 log *crypto* (3 log if *crypto* > 1/100 L)
 - Must use 2 disinfectants

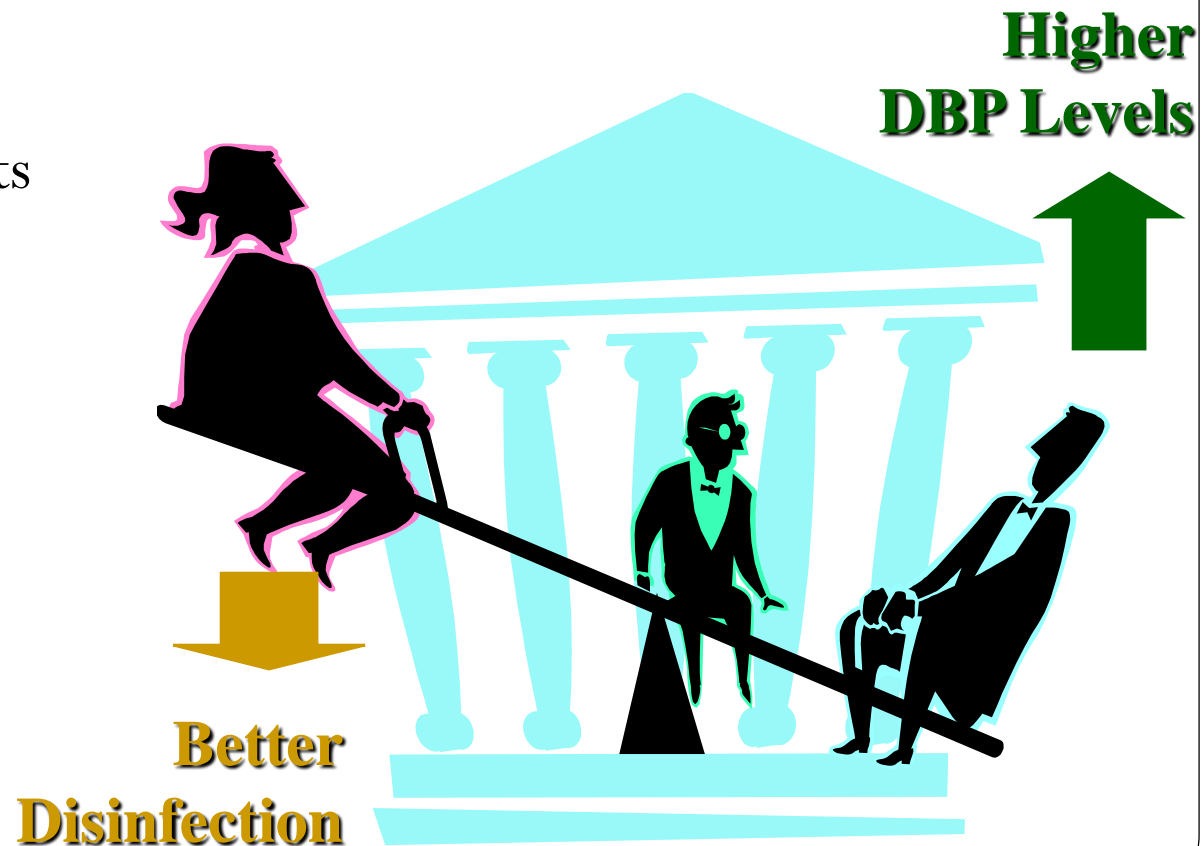
Chlorine - Disinfection Byproducts



The US regulatory approach

- A balancing act between adequate disinfection and minimizing disinfection byproducts

But there are ways we can improve both



The Microbial/DBP Cluster: Status

Pathogens

DBPS

- Older

- Surface Water Treatment Rule (SWTR) - 1989
- Interim Enhanced Surface Water Treatment Rule (IESWTR) - 1998
- Filter Backwash Recycle Rule (FBR) - 2001
- Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR) - 2002

- Newer: Jan 4-5, 2006

- Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR)

- Total Trihalomethane Rule (TTHMR) - 1979
- Stage 1 Disinfectant-Disinfection Byproducts Rule (S1 D/DBPR) - 1998
- Stage 2 Disinfectant-Disinfection Byproducts Rule (S2 D/DBPR)

D/DBP Rule (cont.)

Also MCLGs for specific DBP species, and chloral hydrate (0.04 mg/L)

- Specific Requirements (cont.)
 - Establish new MCLs and MRDLs

Published Values (all in mg/L):

| <u>Compound(s)</u> | <u>Stage 1 & 2</u> |
|--------------------|------------------------|
| TTHMs | 0.080 |
| HAA5 | 0.060 |
| Bromate | 0.010 |
| Chlorite | 1.0 |
| Chlorine | 4.0 |
| Chloramines | 4.0 |
| Chlorine Dioxide | 0.8 |

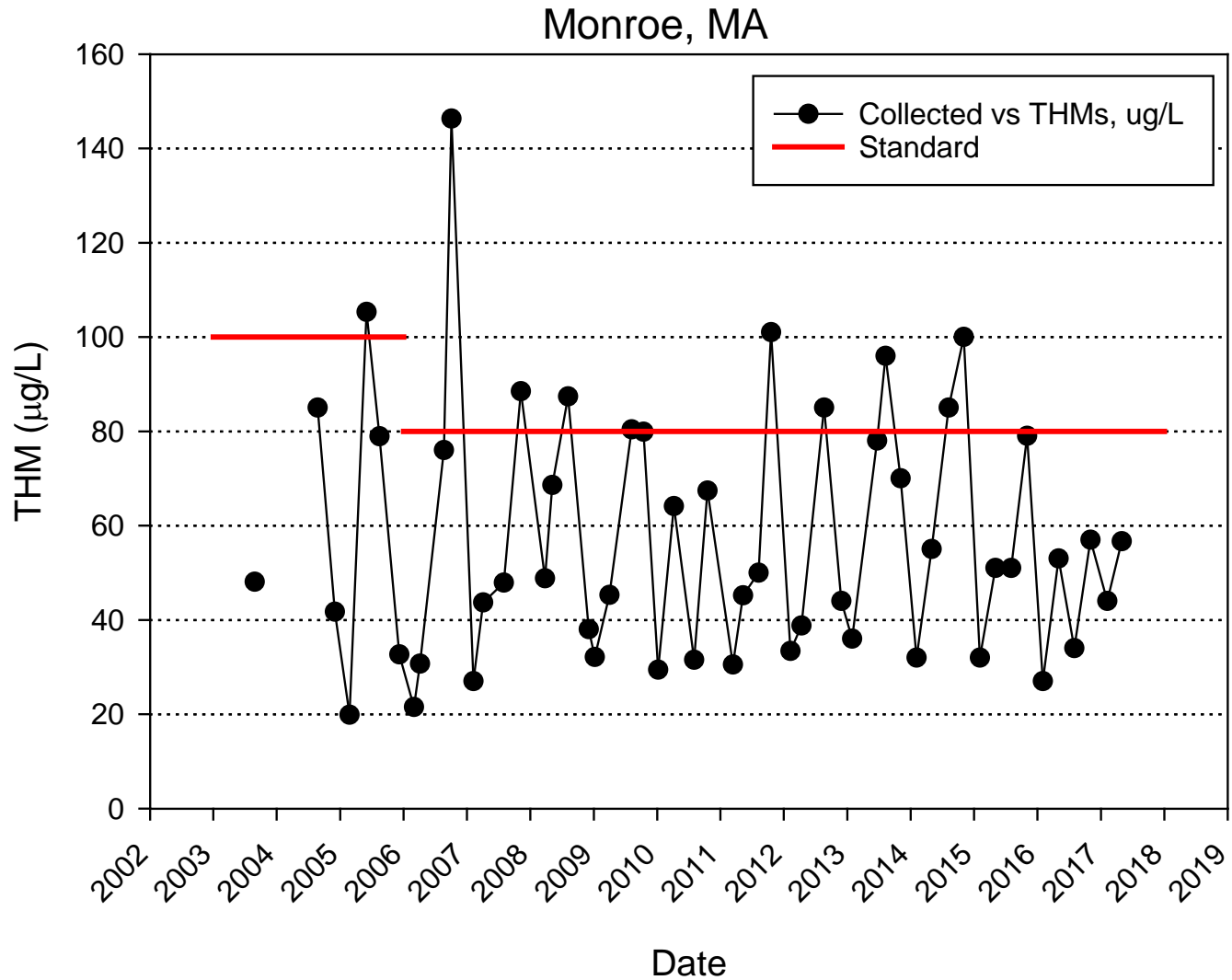
Stage 1: System-wide Running Annual Avg. (RAA)

Stage 2: Locational Running Annual Avg. (LRAA)

MRDLs for chlorine and chloramines may be exceeded in response to public health problems

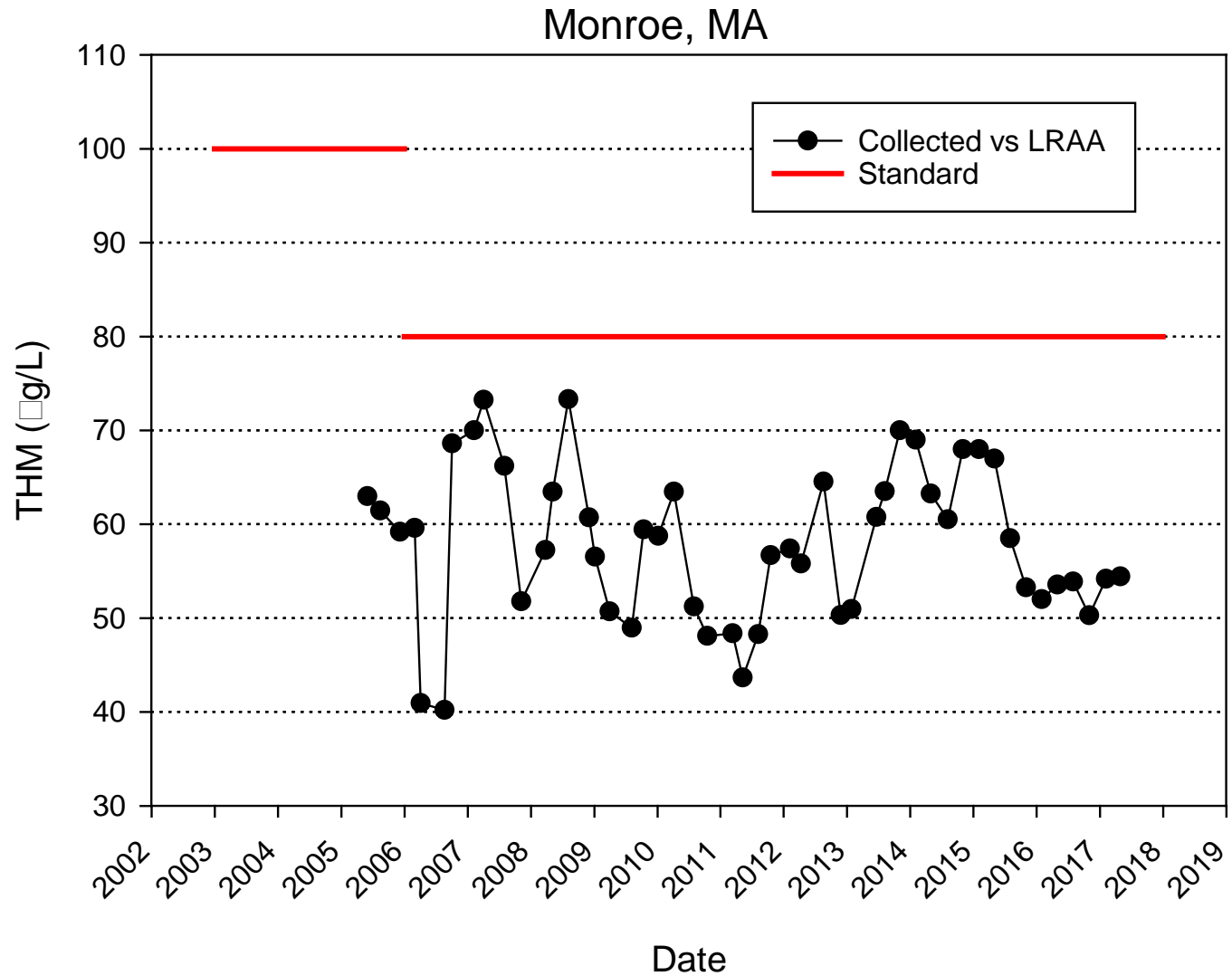
(HAA5 = sum of monochloro, dichloro, trichloro, monobromo, and dibromo)

Monroe: quarterly THMs



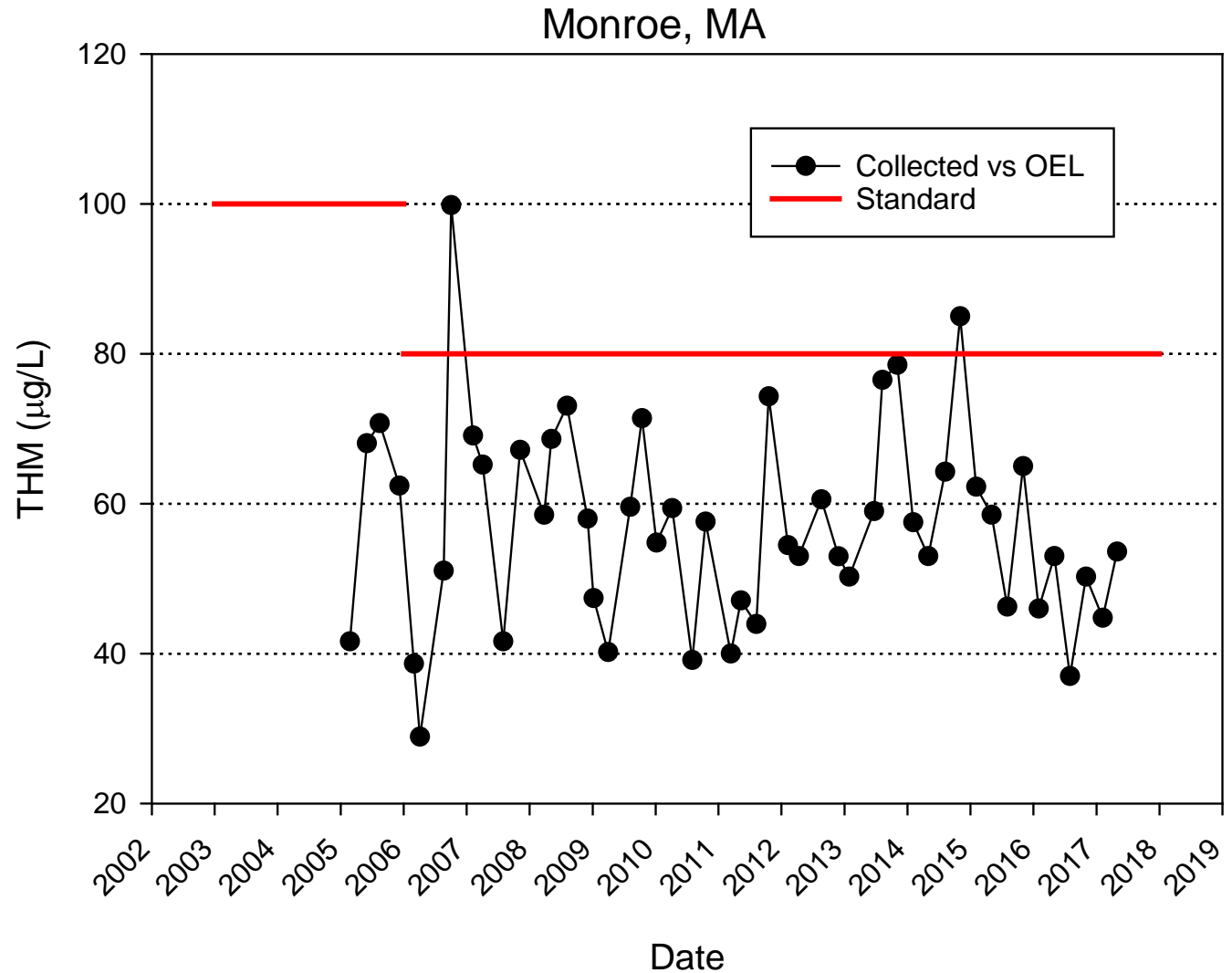
Monroe: LRAA

● XCV



Monroe: OEL

- dsf



D/DBP Rule (cont.)

- Specific Requirements (cont.)
 - Require Best Available Technology:
 - Enhanced Coagulation or Enhanced Precipitative Softening (under Stage 1)
 - Applicability: SW systems using conventional treatment
 - Step 1: Performance Criteria

**Required
Percent
Removal of
TOC**
 (between source
water and
combined filter
effluent)

| Source Water TOC (mg/L) | Source Water Alkalinity (mg/L as CaCO ₃) | | |
|----------------------------|--|-----------|-----------|
| | 0 - 60 | >60 - 120 | > 120 |
| ≤2 | No Action | No Action | No Action |
| >2 - 4 | 35 | 25 | 15 |
| >4 - 8 | 45 | 35 | 25 |
| > 8 | 50 | 40 | 30 |

D/DBP Rule (cont.)

◆ Specific Requirements (cont.)

– Require Best Available Technology (cont.)

» Avoidance Criteria

- ◆ Treated or Source water: TOC < 2.0 mg/L
- ◆ Source water: TOC < 4.0 mg/L, Alk > 60 mg/L, and
 - TTHM and HAA5 < 50% of MCLs, or
 - commitment to technologies that will achieve <50% of MCLs
- ◆ Treated or Source water: SUVA ≤ 2.0 L/mg-m
- ◆ TTHM and HAA5 < 50% of MCLs and only chlorine used for disinfection
- ◆ Systems remove > 10 mg/L magnesium hardness by precipitative softening
- ◆ Softened water alkalinity < 10 mg/L

For softening systems only

D/DBP Rule (cont.)

- Specific Requirements (cont.)
 - Require Best Available Technology (cont.)
 - GAC Adsorption
 - Implementation
 - Stage 1: in place of enhanced coagulation, when chlorine is the disinfectant
 - Stage 2: in addition to enhanced coagulation or enhanced softening
 - Nanofiltration
 - Membrane with MWCO = 1000 Daltons or less

Generally when TOC removal criteria or avoidance criteria can't be met

D/DBP Rule: Stage 2

- Overview
 - Designed to reduce peak occurrences in distribution systems by changing compliance monitoring from system average to each location (LRAA)
 - One-year IDSE conducted to select site-specific optimal sample points to capture peaks and limit THM/HAA variations
- Locational Running Annual Average (LRAA)
 - MCLs: 80/60 - for each monitoring location
 - Monitoring for Large SW systems (> 10,000)
 - quarterly sampling
 - at least one quarterly sample at peak month
 - 4-20 DS locations determined by initial distribution system evaluation (IDSE) and stage 1 locations
 - 2-8 at high THM sites, and 1-7 at high HAA sites
 - Monitoring for small SW systems (< 10,000)
 - 2 locations as determined by IDSE

D/DBP Rule: Stage 2: Compliance

- Population-based monitoring
 - Surface Water Systems (Sub-part H)

| Surface Water System Size | DS Monitoring Locations | | | | Monitoring Frequency |
|---------------------------|-------------------------|--------------|--------------|-------|----------------------|
| | Stage 1 Compliance | Highest TTHM | Highest HAA5 | Total | |
| <500 | 0 | 1 | 1 | 2 | Yearly |
| 500-3,300 | 0 | 1 | 1 | 2 | Quarterly |
| 3,301-9,999 | 0 | 1 | 1 | 2 | Quarterly |
| 10,000-49,999 | 1 | 2 | 1 | 4 | Quarterly |
| 50,000-249,999 | 2 | 3 | 3 | 8 | Quarterly |
| 250,000-999,999 | 3 | 5 | 4 | 12 | Quarterly |
| 1M - <5M | 4 | 6 | 6 | 16 | Quarterly |
| ≥5M | 5 | 8 | 7 | 20 | Quarterly |

D/DBP Rule: Stage 2: Compliance

- Population-based monitoring
 - Groundwater Systems

| Groundwater System Size | DS Monitoring Locations | | | | Monitoring Frequency |
|-------------------------|-------------------------|--------------|--------------|-------|----------------------|
| | Stage 1 Compliance | Highest TTHM | Highest HAA5 | Total | |
| <500 | 0 | 1 | 1 | 2 | Yearly |
| 500-9,999 | 0 | 1 | 1 | 2 | Yearly |
| 10,000-99,999 | 1 | 2 | 1 | 4 | Quarterly |
| 100,000-499,999 | 1 | 3 | 2 | 6 | Quarterly |
| ≥500,000 | 2 | 3 | 3 | 8 | Quarterly |

D/DBP Rule: Stage 2 (cont.)

- Operational Evaluation Level formerly called “Significant Excursions”
 - What is an OEL?:
 - If the next quarter’s HAA & THM values were the same as the current one, would you still be in compliance with the 80/60 LRAA?
 - If no, you have an OEL exceedance
 - Determined quarterly; not a violation, but needs to be reported to the state
 - What to do if you have an OEL exceedance?
 - Conduct an Operational Evaluation to determine “cause” of exceedance
 - Submit a report to the state ≤ 90 days from notification of DBP values causing the exceedance
 - What’s covered in an Operational Evaluation
 - Treatment & distribution practices that might have caused the exceedance
 - Storage tank operations, excess storage capacity distribution system flushing, source water quality, treatment processes & operation

D/DBP Rule: Stage 2 (cont.)

- Operational Evaluation Level (cont.)
 - When does this provision start?:
 - As soon as the 3rd quarter of Stage 2 compliance data are received
 - i.e., between 2013 and 2014 depending on size
 - Provision for “limited” OE if exceedance is due to
 - A localized phenomenon or of known cause
- Operational Evaluation
 - Components
 - Distribution system evaluation
 - Treatment Process evaluation
 - Source water evaluation
 - Steps to minimize future exceedances
 - EPA Guidance Manual
 - http://www.epa.gov/ogwdw/disinfection/stage2/pdfs/draft_guide_stage2_operationalevaluation.pdf

Fluoride

- Balance between Dental Caries and Fluorosis
- Recommended dose
 - 0.7 to 1.2 mg/L
 - Based on temperature

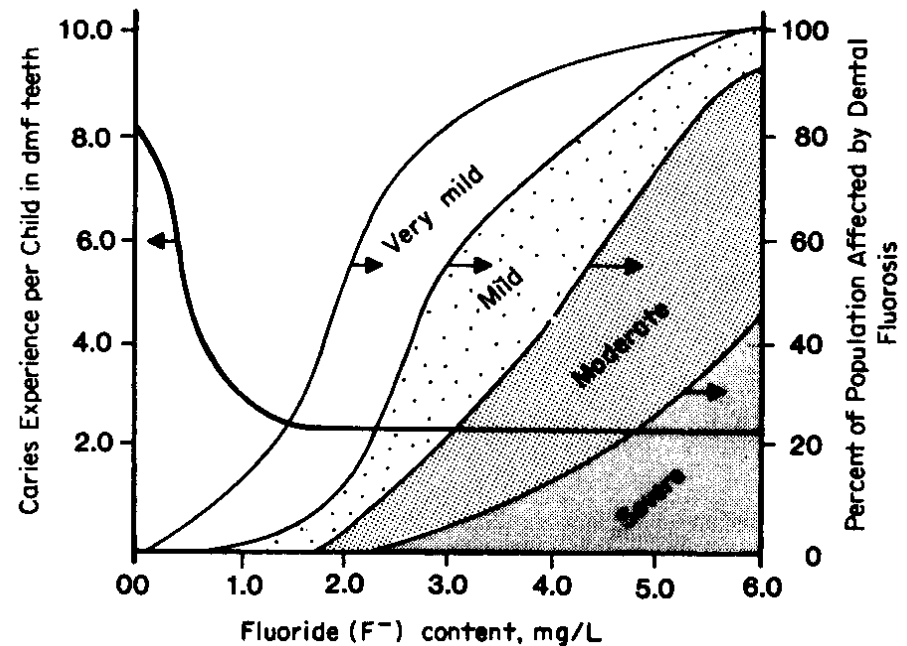


Fig. 15.3 from *Water Quality & Treatment, 1999 (5th edition)*

Iron & Manganese (Fe/Mn)

- Secondary MCLs
 - 0.3 mg/L for iron (0.1 mg/L preferred)
 - 0.05 mg/L for manganese (0.02 mg/L preferred)
- Possible health concerns for Manganese

Why remove Fe/Mn

- No known adverse health effects associated with typical levels of Fe or Mn in drinking water
- “High” (relative) levels can lead to water discoloration complaints and staining of laundry & fixtures
- US Treated Water Standards
 - (recommended goals address chronic water quality problems)

| | IRON (mg/L) | MANGANESE (mg/L) |
|-----------------------|----------------|---------------------|
| EPA Secondary MCLs | 0.3 | 0.05 |
| Recommended Goals | 0.1 | 0.015 |

David Reckhow

Sources of Fe & Mn

Based on: J.E. Tobiason

- Groundwater:
 - mineral dissolution under reducing (anoxic) conditions
 - concentration relatively stable over time, but can vary widely between different wells in same “well field” (aquifer location)
- Surface Waters:
 - occurrence of reducing conditions in influent waters
 - i.e., thermal stratification leading to anoxic hypolimnion in lakes or reservoirs (possible control via multiple depth intake options)
 - significant seasonal variations in concentrations likely
 - Fe or Mn in river sources is usually in particulate form
- Treatment Plant Sources
 - Anoxic sludge blankets in clarifiers (i.e., if solids not continuously removed from clarifier)
 - Recycle flows from backwash lagoons, dewatering systems, etc
 - Mn as contaminant in Fe coagulants (might add 20 to 50 $\mu\text{g/L}$)
- Other: acid mine drainage, landfill leachate

Treatment Approaches

- Oxidation & Precipitation
 - **Strong Oxidants (KMnO_4 , ClO_2 , O_3)**
 - **Weak Oxidants - Fe only (O_2 , Cl_2)**
- Greensand Filtration
 - **naturally occurring or manufactured zeolite**
 - **adsorption & oxidation**
- Oxide-Coated Filter Media
 - **coatings on normal media; adsorption & oxidation**
- Biological Oxidation
- Membrane Filtration (RO, NF; if dissolved)

Based on: J.E. Tobiason

Oxidation & Precipitation

- *Stoichiometry:*
 - need to add sufficient oxidant to react with metal
 - see Tables for reactions with various oxidants
 - must also satisfy competing oxidant demand (NOM, other reduced species), so add in excess of stoichiometric amount
- *Rate of reaction (kinetics):*
 - need sufficient time for oxidation
 - rate can be affected by pH, temperature, etc.
- *Removal of precipitated (oxidized) metals:*
 - Use various solid/liquid separation processes
 - Clarification (often preceded by coagulation)
 - Media filtration: requires destabilized particles/colloids
 - MF/UF membrane filtration

Based on: J.E. Tobiason

Stoichiometry of Fe Oxidation

Based on: J.E. Tobiason

| Oxidant | Reaction for Oxidation of Fe(II) to Fe(III) | Stoichiometry (mg ox/mg Fe) |
|---|--|--------------------------------|
| O ₂ (aq) | $2\text{Fe}^{2+} + \frac{1}{2} \text{O}_2 + 5\text{H}_2\text{O} \rightarrow 2\text{Fe}(\text{OH})_3(\text{s}) + 4\text{H}^+$ | 0.14 |
| O ₃ →O ₂ (aq) | $2\text{Fe}^{2+} + \text{O}_3 + 5\text{H}_2\text{O} \rightarrow 2\text{Fe}(\text{OH})_3(\text{s}) + \text{O}_2 + 4\text{H}^+$ | 0.43 |
| Cl ₂ (HOCl) | $2\text{Fe}^{2+} + \text{HOCl} + 5\text{H}_2\text{O} \rightarrow 2\text{Fe}(\text{OH})_3(\text{s}) + \text{Cl}^- + 5\text{H}^+$ | 0.64 |
| ClO ₂ → ClO ₂ ⁻ | $\text{Fe}^{2+} + \text{ClO}_2 + 3\text{H}_2\text{O} \rightarrow \text{Fe}(\text{OH})_3(\text{s}) + \text{ClO}_2^- + 3\text{H}^+$ | 1.20 |
| MnO ₄ ⁻ | $3\text{Fe}^{2+} + \text{MnO}_4^- + 7\text{H}_2\text{O} \rightarrow 3\text{Fe}(\text{OH})_3(\text{s}) + 2\text{MnO}_2(\text{s}) + 5\text{H}^+$ | 1.41 |

Iron Control

- Fe^{2+} is rapidly oxidized by dissolved oxygen (a **Based on: J.E. Tobiason** very weak oxidant) at $\text{pH} > 7$ (if not complexed with natural organic matter (NOM))
- *For groundwater, often have Fe(II) oxidation along with aeration to strip elevated CO_2 (this raises pH as well)*
- Strong oxidants result in almost instantaneous oxidation of Fe(II)
- *Oxidants always react much faster with Fe(II) than Mn(II); impacts on sequencing of oxidant addition*
- Usually Fe removal is very good if Mn removal is done well

Stoichiometry of Mn Oxidation

Based on: J.E. Tobiason's notes

| Oxidant | Reaction for Oxidation of Mn(II) to Mn(IV) | Stoichiometry (mg ox/mg Mn) |
|---|---|--------------------------------|
| O ₂ (aq) | $\text{Mn}^{2+} + \frac{1}{2} \text{O}_2 + \text{H}_2\text{O} \rightarrow \text{MnO}_2(\text{s}) + 2\text{H}^+$ | 0.29 |
| O ₃ →O ₂ (aq) | $2\text{Mn}^{2+} + \text{O}_3 + \text{H}_2\text{O} \rightarrow \text{MnO}_2(\text{s}) + \text{O}_2 + 2\text{H}^+$ | 0.88 |
| Cl ₂ (HOCl) | $\text{Mn}^{2+} + \text{HOCl} + \text{H}_2\text{O} \rightarrow \text{MnO}_2(\text{s}) + \text{Cl}^- + 3\text{H}^+$ | 1.30 |
| ClO ₂ → ClO ₂ ⁻ | $\text{Mn}^{2+} + 2\text{ClO}_2 + 2\text{H}_2\text{O} \rightarrow \text{MnO}_2(\text{s}) + 2\text{ClO}_2^- + 4\text{H}^+$ | 2.45 |
| MnO ₄ ⁻ | $3\text{Mn}^{2+} + 2\text{MnO}_4^- + 2\text{H}_2\text{O} \rightarrow 5\text{MnO}_2(\text{s}) + 4\text{H}^+$ | 1.44 |

Lead & Copper Rule (LCR)

- **Action levels** for lead and copper — 0.015 mg/L and 1.3 mg/L
 - An action level is different from a MCL. While an MCL is a legal limit on a contaminant, an action level, as the name suggests, is a trigger for additional prevention or removal steps.
- **Samples and triggers:**
 - Must collect “**first draw**” water samples (water that has been standing in plumbing pipes at least six hours and is collected without flushing the tap) at points throughout the distribution system that are vulnerable to lead contamination, including regularly-used bathroom or kitchen taps.
- **Trigger:** When the level of lead or copper reaches the action level in **ten percent** of the tap water samples, the water system must take certain steps. These steps can include:
 - Source water monitoring and treatment of source water, if lead or copper are present in the source water;
 - Use of a **corrosion control treatment** (by increasing the water's pH or alkalinity, water systems can make their water less corrosive, and therefore less likely to dissolve the lead or copper from the pipes or fixtures);
 - Measures to educate the affected public about reducing its lead intake; or
 - Replacement of lead water mains and service lines (if source water and corrosion control treatment are not effective in lowering levels of lead and copper at the tap).

Number of samples

- Number of sites depends on population served
- Minimum number of tap samples under LCR

| Population served | Regular monitoring | Reduced monitoring |
|-------------------|--------------------|--------------------|
| ≤ 100 | 5 | 5 |
| 101 - 500 | 10 | 5 |
| 501 – 3,300 | 20 | 10 |
| 3,301 – 10,000 | 40 | 20 |
| 10,001 – 100,000 | 60 | 30 |

Where to collect the samples

- All residence sampling locations must be from Tier 1 sites if there are enough. 1000-mL samples must be collected from each:
 - **Tier #1 sites**: Single family structures that contains copper pipes with lead solder installed between 1983 and 1988, or contain lead pipes and/or served by a lead service line (LSL). If the PWS has LSLs, then it must collect 50% of the samples from the LSL. If there are not enough LSLs for 50%, the PWS must sample at all sites with LSLs.
- If the PWS does not have enough Tier 1 sites, then it must collect LCR samples from Tier 2 sites, and if not enough then Tier 3:
 - **Tier #2 sites**: Buildings (i.e. apartment buildings) that contain the Tier #1 materials
 - **Tier #3 sites**: Single family structures that contain copper pipes with lead solder installed before 1983
- CWS that serve **schools/childcare facilities** are also required to rotate through their schools/childcare list, collecting two 250-mL samples (kitchen and bubbler/fountain) from each of two schools during the monitoring period.

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- Long history of man's self-inflicted exposure to lead and resulting deaths, dementia, denial, etc.



**THE GREAT
LEAD WATER PIPE
DISASTER**

WERNER TROESKEN

Abbreviations #1

- **Alk**=Alkalinity
- **BAT**=Best Available Technology
- **CPE**=Comprehensive Performance Evaluation
- **CWS**=Community Water Systems
- **D/DBP**=Disinfectant – Disinfection Byproducts
- **D/DBPR**=Disinfectant – Disinfection Byproducts Rule
- **DBP**=Disinfection Byproducts
- **DCAA**=Dichloroacetic Acid
- **DE**=Diatomaceous Earth
- **DF**=Direct Filtration
- **DS**=Distribution System
- **EBCT**=Empty Bed Contact Time
- **FACA**=Federal Advisory Committee Act
- **FBR**=Floc Blanket Reactor
- **FC**=Fecal Coliform
- **GAC**=Granular Activated Carbon
- **GW**=Groundwater
- **HAA**=Haloacetic Acid
- **HPC**=Heterotrophic Plate Count
- **ICR**=Information Collection Rule
- **IESWTR**=Interim Enhanced Surface Water Treatment Rule
- **IDSE**=Initial Distribution System Evaluation

Abbreviations #2

- **LRAA**=Locational Running Annual Average
- **LT2ESWTR**=Long Term 2 Enhanced Surface Water Treatment Rule
- **LT1ESWTR**=Long Term 1 Enhanced Surface Water Treatment Rule
- **MCL**=Maximum Contaminant Level
- **MCLG**=Maximum Contaminant Level Goal
- **MRDL**=Maximum Residual Disinfectant Level
- **NTNCWS**=Non-Transient Non-Community Water Systems
- **OGWDW**=Office of Groundwater and Drinking Water
- **PODR**=Point of Diminishing Return
- **PQL**=Practical Quantitation Limit
- **RegNeg**=Regulatory Negotiations
- **RT**=Residence Time
- **S1D/DBP**=Stage 1 Disinfection – Disinfectant Byproducts
- **S2D/DBP**=Stage 2 Disinfection – Disinfectant Byproducts
- **SUVA**=Specific UV Absorbance
- **SW**=Surface Water
- **SWTR**=Surface Water Treatment Rule
- **THM**=Trihalomethane
- **TNCWS**=Transient Non-Community Water Systems
- **TOC**=Total Organic Carbon
- **TOX**=Total Organic Halides
- **TTHM**=Total Trihalomethanes