



MassDEP

Drinking Water Program

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Drinking Water Program Updates

2019-09-12

This week's program director email has these topics of interest:

1. DOD and Congressional Task Forces Address PFAS
2. LCR 90th Percentile Data Reports
3. Changes to Two Certified Operator Forms
4. Groundwater-Based Source Protection
5. Recruiting New Operators
6. Creating the Water Workforce of the Future
7. Are You Prepared for a Water Contamination Incident?
8. Lead Service Line Replacement Collaborative – Webinar
9. Editor's Omission from 2019-08-30
10. Training

DOD and Congressional Task Forces Address PFAS

Association of State Drinking Water Administrators, September 5, 2019



The Department of Defense (DoD) PFAS Task Force and Congressional PFAS Task Force are moving forward with efforts to address per- and polyfluoroalkyl substances (PFAS) contamination across the country.

DoD PFAS Task Force: On July 23rd, the day that Defense Secretary Esper took office, he announced the establishment of the DoD PFAS Task Force. The purpose of the task force is to ensure a coordinated nationwide DOD approach... [+ Read More](#).

LCR 90th Percentile Data Reports

LCR 90th percentile values for the most recent round of sampling have been posted on our website at <https://www.mass.gov/service-details/public-water-systems-90th-percentile-lead-sampling-results>.

Changes to Two Certified Operator Forms

Two certified operator forms were updated to correct slight errors in their formatting. The corrected forms, Typical Duties and Responsibilities of a Certified Operator Seasonal NC, VSS (form COD-3), and Year-Round NC, VSS (form COD-4) can be found at: <https://www.mass.gov/lists/certified-operator-forms>.

Groundwater-Based Source Water Protection

The Association of State Drinking Water Administrators (ASDWA) and the Groundwater Protection Council (GWPC) have issued a four page paper titled *Groundwater-Based Source Water Protection*, available at https://www.asdwa.org/2019/09/03/asdwa-and-gwpc-release-groundwater-based-source-water-protection-paper/?utm_source=ASDWA+Newsletter+-+Weekly&utm_campaign=52dfb76c7f-EMAIL_CAMPAIGN_2019_09_06_08_00&utm_medium=email&utm_term=0_3b7df4d5fa-52dfb76c7f-446557317. The information in the paper can be used to explain Source Water Protection to staff at public water systems, municipal officials and the public. For questions about Source Water Protection in Massachusetts, please contact program.director-dwp@mass.gov.

Recruiting New Operators

The next interview in our recurring article, Recruiting and Retaining Drinking Water Operators, Jim Starbard from RCAP Solutions is featured. Thank you Jim, for sharing your insight on how you obtain good small system operators. It is very interesting how you utilize trainings and trade shows to scout out operators.

If you have succeeded in recruiting and retaining certified operators or perform work to attract people to the industry, please let us know at Program.Director-DWP@mass.gov. We may highlight your story in a future Program Director email.



Creating the Water Workforce of the Future - Webinar Series

People are a Utility's Most Important Asset

Recruiting, retaining, and motivating a talented and diverse workforce is one of the most important challenges facing today's water and wastewater utilities. As utilities confront this challenge, it often takes many partners to create a truly sustainable workforce. Without which, our water infrastructure assets would suffer, as would the benefits of clean and safe water for our communities.

Please join EPA and other partners to hear how one utility, the Hampton Roads Sanitation District (HRSD) in Virginia, is working with the Hampton Roads Public Works Academy to build a pipeline of diverse and talented staff in their organization.

Schedule and Registration

October 23, 2019

1:30-3:00 p.m. Eastern Time

[Register Here](#)

Are You Prepared for a Water Contamination Incident?



Use the Water Quality Surveillance and Response Capabilities tool (CAT) to evaluate existing water quality surveillance and response capabilities at your water utility. The tool generates a custom report that summarized current capabilities, suggests potential enhancements, and provides useful resources.

[Access Tool Here](#)

Enhance your Organizations Preparedness

The Water Laboratory Alliance's (WLA) Analytical Preparedness Self-Assessment (APS) Tool helps water utilities, laboratories, and other stakeholders evaluate their level of analytical preparedness for contamination response. The tool develops a tailored recommendation and suggests resources to increase resilience to contamination incidents.

[Access the WLA APS Here](#)

How would Your Water Utility Respond to a Water Contamination Incident?

With the *Guidance for Responding to Drinking Water Contamination Incidents*, you and your response partners will be able to prepare for water contamination in your distribution system.

[Explore the Guidance Here](#)

Lead Service Line Replacement Collaborative – Webinar

The next webinar in the Collaborative's series will focus on LSL replacement in small/rural systems and is scheduled for Wednesday, October 2. **Please register and encourage others to register by sharing this webinar with your networks. (See social media package attached for registration details and outreach options.)**

Webinar details

Rural Community Assistance Partnership, Small Water Systems and Lead Service Line Inventories

Registration: <https://bit.ly/3OFFyc3>

Date: October 2, 2019

Time: 3PM EDT- 4PM EDT

Webinar Description:

Lead service line (LSL) replacement is not a simple task. The LSL Replacement Collaborative has developed an online toolkit to help communities across the United States develop and implement replacement programs. This webinar explores LSL replacement issues for small community water systems and explains the services that the [Rural Community Assistance Partnership](#) (RCAP) provides to these systems. It is the eighth in the LSL Replacement Collaborative's series and will focus on small community water systems – those that serve less than 10,000 customers – and how they are managing LSLs as part of their asset management program and responding to customer concerns and state requirements.

Speakers will provide:

- Background on RCAP and the services it provides to small drinking water systems
- Challenges small communities face with lead and LSLs
- Efforts to help small systems inventory and communicate LSLs in their distribution system.

Moderator:

- Tom Neltner, Chemicals Policy Director, Environmental Defense Fund

Speakers:

- Ted Stiger, Senior Director of Government Affairs and Policy, RCAP

· Jeff Oxenford, Director of Training and Technical Service, RCAP

Editor's Omission from 2019-08-30

The last Program Director's email of October 30, 2019 ran an article titled, "EPA Outline for Lead Service Line Replacements" (See below). It referred to an attached article from the "Inside Washington Publishers" that was inadvertently left off the email. The missing attachment is now attached to this email. The corrected version of October 30, 2019 Pdirector email can be found on the MassDEP Communications page at:

<https://www.mass.gov/lists/communication-to-public-water-suppliers>.

EPA Outline for Lead Service Line Replacements

State drinking water regulators have developed guidance on how to identify lead-containing drinking water service lines ahead of the release in the coming weeks of EPA's proposal to update its lead and copper rule (LCR) which is expected to require utilities to map the location of such pipes to help prioritize the most corrosive lines for replacement.

For more information please read the attached file, LSL Replacement EPA Rule.

Training

When you need training please look at the training calendar located at:

<http://www.mass.gov/eea/agencies/massdep/water/drinking/drinking-water-training-class-schedules.html> for upcoming trainings.

If you need a refresher on recently given trainings, you can review several training videos located at:

https://www.youtube.com/playlist?list=PLJn2AKOcYr7lutGJB-UfDKtQPF_o_249m

or click here:  **YouTube**

MassDEP is sending this important drinking water information to all PWS responsible persons who are listed on the state database. If you are no longer the correct responsible person for the PWS please reply with the correct contact information. MassDEP needs one responsible contact person from each PWS.

Operators, consultants, and others who are interested in Drinking Water Program updates are encouraged to request to be subscribed to this email list. You may also request to be unsubscribed by replying to this email.

This MassDEP Program Director technical assistance email is funded by the Safe Drinking Water Act Assessment (Section 70) Program. The Assessment is paid by all consumers of public water in Massachusetts and is collected by public water systems. For more information about the Assessment Program, go to

<http://www.mass.gov/eea/agencies/massdep/news/advisory-committees/safe-drinking-water-act-assessment-advisory-committee.html>.

Operator Recruit-Retain Interview

Jim Starbard, RCAP Solutions

1. Where is your PWS?

RCAP Solutions provide technical assistance to small water systems throughout MA. We also manage two communities for US HUD which are PWSs.

2. What is your population served?

10,000 and below (under 36 in our PWSs)

3. How many operators do you currently employ?

We currently have five employees that work at least part of their time in MA and all are licensed operators (4 DW, 1 WW).

4. How do you recruit and retain operators?

RCAP has found recruiting at our trainings and trade shows has been highly successful. The communities we serve in need of operators usually need to increase salaries to recruit full time help. Remote, small communities are finding that contract water operator firms are requiring technology upgrades that allow remote operation functions before taking on their system due to travel distance.

5. Do you promote from within?

Yes, all positions are offered internally per company policy.

6. What does your current workforce look like re: new versus long-time employees?

RCAP has a great mix of ages and experience levels and that has materialized in the last few years as funding increased.

7. Are you working within your community to identify and train future operators?

Always looking to promote the water operator field and recently it has been put in as a grant requirement under our US EPA funding.

8. Do you have a plan to attract operators by offering internship opportunities?

Internally no, but we are always looking to connect interested people with known internships available.

9. Is the salary that you offer within your control?

Do you know if it competitive with salaries and benefits offered by other PWS?

Salary is not under my control, but salaries offered seem to be in line with other like careers with the same qualification requirements.

10. Do you consider your recruitment/retention program to be successful?

Yes, our efforts region-wide have attracted great talent and in the last few years our staff has doubled as funding has increased.

11. Are there any lessons learned that you can share?

Water operators are a licensed profession and should be paid as such. No one thinks twice of giving a licensed plumber a \$100+ an hour to fix a toilet but then wants to give a water operator \$15 an hour to run their town's drinking water system.

12. What else would you like to add?

I see market-driven pay increases for drinking water operators to be inevitable, supply and demand dictates it. The water systems that get ahead of the trend with compensation, benefits, and work/life balance will be in a better position to recruit and retain from the shrinking pool of talent.

INSIDE WASHINGTON PUBLISHERS

exclusive, relevant news about the federal policy-making process

<https://iwpnews.com/>

By Lara Beaven, Senior Editor

Awaiting EPA Rule, States Outline Options for Lead Service Line Surveys

August 26, 2019

State drinking water regulators have developed guidance on how to identify lead-containing drinking water service lines ahead of the release in the coming weeks of EPA's proposal to update its lead and copper rule (LCR) which is expected to require utilities to map the location of such pipes to help prioritize the most corrosive lines for replacement.

[The white paper](#), from the Association of State Drinking Water Administrators (ASDWA), presents several options for states to conduct the lead service line (LSL) surveys but notes that not all of these recommendations may be feasible for a state to carry out during development and implementation of an LSL inventory.

ASDWA says the paper is based on the experiences of fewer than one dozen states that have already conducted voluntary or mandatory surveys of community water systems (CWSs) in response to state legislation.

It notes that in addition to the anticipated requirements in the revised LCR, EPA's 2020 Drinking Water Infrastructure Needs Survey and Assessments will include an estimate of the number of public and private lead service lines as well as an estimate of the costs to replace all lead service lines. ASDWA's release of the guidance comes as the administration is expected to soon issue its long-awaited LCR. EPA sent its draft proposed LCR to the White House Office of Management and Budget for interagency review June 6, and Administrator Andrew Wheeler [said last month](#) that the proposal would be out by the end of August.

Wheeler has said the rule will include a three-step structure that aims to map the country's remaining lead drinking water pipes and model their levels of corrosion before prioritizing the "most corrosive" lines for replacement and will consider mandatory testing of lead levels in drinking water at schools and day care centers.

The rule is expected against a backdrop of growing public concern about the presence of lead in drinking water. In New Jersey, for example, state officials sought [commitments from](#) EPA to provide additional assistance to Newark, NJ, where tests showed filters the agency had recommended using were not reducing the high levels of lead.

While it is not clear whether EPA agreed to provide additional resources, days later, local officials were forced to issue billions of dollars in debt to finance service line replacements.

According to [local press reports](#), “Essex County, NJ, will issue a \$120 million bond to replace the problematic lead service pipes with copper ones. It drastically speeds up the ongoing project, which was initially scheduled to take eight to 10 years. Now, it’s expected to take a year and a half to three years.” But local officials cautioned that such an option may not be available to other localities because the county has a rare AAA credit rating that may not be available to other entities.

“The AAA bond rating is an obscure achievement to the public, but today clearly demonstrates why it is so important. Because of our fiscal health, we are able to borrow money at a significantly lower rate that will save Newark upwards of \$15-20 million in interest over the life of the bond,” said county executive Joseph DiVincenzo, Jr.

Newark has been struggling for some time to address its drinking water problems caused in part by lead service lines, prompting the Natural Resources Defense Council to sue city and state officials last year for alleged violations of federal requirements to limit lead in drinking water.

Survey Burdens

ASDWA [previously warned](#) EPA that provisions it was considering including in the proposal could significantly increase state workloads and reduce federal funding for states to administer drinking water regulations as well funding for infrastructure improvements.

And the white paper notes, “In many states, developing and implementing a LSL inventory will be a resource intensive project. Reporting through an online portal and delivering content via a website may pose significant barriers to some states, particularly when IT and computer services are centralized within the state.”

For example, California, which is one of four states that currently require LSL surveys, estimates that it has spent 1,800 to 2,700 hours of staff time, or the equivalent of 1.0 to 1.5 full-time employee annual hours on their LSL inventory over about two years.

The other states that require CWSs to provide summaries of their service line materials are Illinois, Michigan and Wisconsin. Wisconsin is considered a leader in the effort, having required reporting for the portion of the service line owned by regulated CWSs since 2004 and extending the reporting requirement in 2018 to include the portion of the service line not owned by the CWS.

Four states -- Indiana, Massachusetts, North Carolina and Washington -- have conducted voluntary surveys in response to [a February 2016 letter](#) from EPA. And Alaska, Louisiana, Kansas and Texas have requested that CWSs submit or update their service line materials.

ASDWA says Indiana, Massachusetts and Washington may serve as good examples for other states on how to conduct voluntary surveys. The white paper says Indiana posted the survey forms in an on-line virtual file cabinet while Massachusetts went a step further and published a report. Washington state went beyond those steps and conducted follow-up interviews with CWSs to refine the estimates and published several reports.

Additionally, California and Ohio required CWSs to submit maps showing where LSLs are likely to be located.

“It’s important to recognize that there may be significant barriers to a state developing a mandatory lead service line inventory. A voluntary survey may be the most attainable option for some states,” ASDWA says, adding that voluntary programs using best practices can have a response rate covering over 90 percent of service lines, as is the case with Indiana and Washington. It is not clear how the expected mandate in EPA’s revised LCR to survey LSLs may affect those barriers.

ASDWA Recommendations

In general, ASDWA says states should enable CWSs to submit information through an online portal and ask them to identify materials of the entire service line, including who owns which portions. State should provide a means to address uncertainty of service line material and provide detailed guidance on how to account for and capture lead components of a service line due to the numerous service line configurations that may involve some lead components, such as partial lead service lines, pigtails, goosenecks and solder.

Especially in the first round of reporting, states should follow up with CWSs that fail to report and analyze the information submitted to identify potential reporting errors or inconsistencies. States should also make the reports submitted by individual CWSs publicly available through a user-friendly online portal, indicate those CWSs that have not submitted a report, and provide an option to download all reports submitted in a single file.

States should develop the capability to readily generate summary reports in event of media or public inquiries, the white paper says.

If a state already requires CWSs to submit annual reports for other purposes, it should consider modifying those existing reporting requirements to include service line information.

If a state does not already require annual reports, it should conduct an initial voluntary survey to assess the situation and determine whether additional reporting is needed, the white paper says, noting that where state law allows, there are number of survey tools, such as Survey Monkey, that can simplify data collection. Another option is to collaborate with other organizations, such as a state university or the state section of the American Water Works Association, which represents drinking water utilities, to conduct the survey.

The white paper says a state without annual reports may consider requiring a one-time, preliminary inventory report followed by a comprehensive inventory report a few years later. The comprehensive report would generally expect that service lines of unknown material included in a preliminary report would be estimated as containing or not containing lead. This approach will help the state be prepared to submit an accurate assessment of future state revolving fund needs and potential challenges, ASDWA says.

However, it notes two caveats. A comprehensive report will focus resources on resolving unknowns instead of on replacing the LSLs where they are known to be used. Additionally, an annual report, if part of a regular reporting requirement, will focus attention on making steady progress in replacing LSLs and in resolving the identity of unknown service lines. -- *Lara Beaven*