



ADEM Drinking Water Update

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Today's Topics

- Lead
- PFAS
- CCR Revisions
- Cybersecurity
- eMOR



Lead and copper
(actually, just lead)



Do I have to submit an inventory?

- Yes! All community and NTNC systems must submit a service line inventory.
- The inventory is an actual inventory, a complete list of all service lines identified by address.



But we don't have any lead!

- Doesn't matter!



You're full of it Aubrey, why are we doing this?

1. To conclusively locate any lead service lines for eventual removal.
2. Customer notification/transparency.



Lead Service Line Inventory

- Due to ADEM by October 16, 2024
- Must identify and categorize all service lines as lead, non-lead, galvanized requiring replacement or unknown.
- Must identify both sides of meter, regardless of owner.
- Must include street address and status of lead connectors
- Must be updated annually or every three years, depending on monitoring schedule.



LCRR: Service Line Inventory

Water systems shall review the following records to identify the service line materials for the initial inventory:

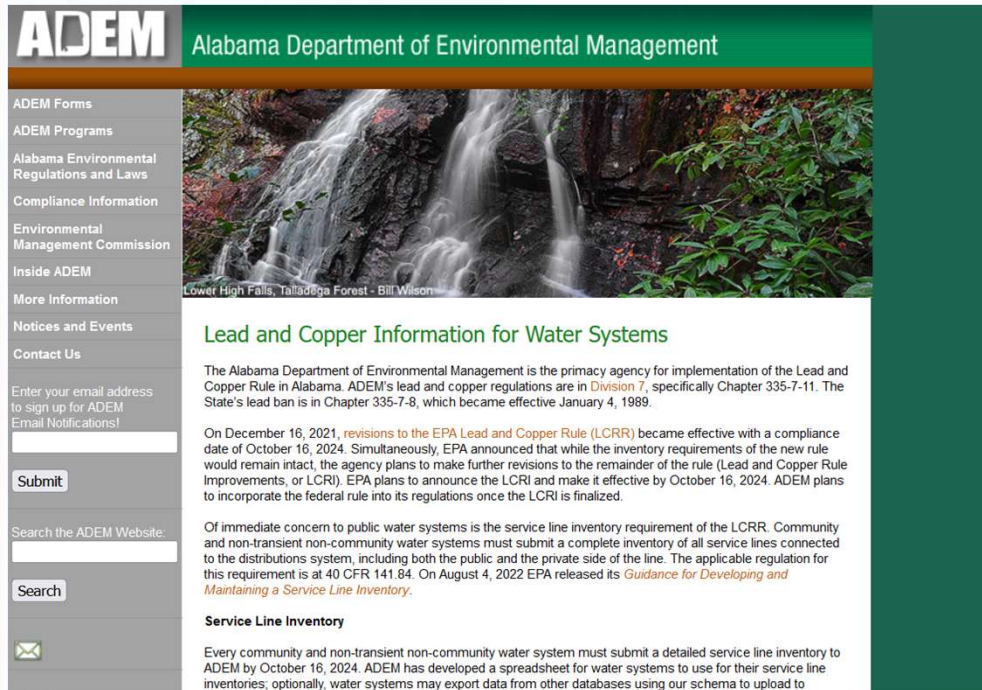
1. Information on lead and galvanized lines submitted for LCR materials evaluation;
2. Construction and plumbing codes/permits/etc.;
3. Water system records, including tap cards, maps, drawings, meter records, SOPs, etc.; and,
4. All inspections and records of the distribution system that indicate the composition of the SL.



LCRR: Service Line Inventory

- ADEM has developed a template required for submittal of inventories.
- Submittals can be done via EDWRS and should include an inventory and certification form.
- Must notify customers with LSLs, galvanized requiring replacement, and unknowns within 30 days of completing initial inventory; repeat each year.
- Systems serving >50,000 people must post online.
- See EPA guidance.

ADEM Lead and Copper Page



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Lead and Copper Information for Water Systems

The Alabama Department of Environmental Management is the primary agency for implementation of the Lead and Copper Rule in Alabama. ADEM's lead and copper regulations are in *Division 7*, specifically Chapter 335-7-11. The State's lead ban is in Chapter 335-7-8, which became effective January 4, 1999.

On December 16, 2021, *revisions to the EPA Lead and Copper Rule (LCRR)* became effective with a compliance date of October 16, 2024. Simultaneously, EPA announced that while the inventory requirements of the new rule would remain intact, the agency plans to make further revisions to the remainder of the rule (Lead and Copper Rule Improvements, or LCRI). EPA plans to announce the LCRI and make it effective by October 16, 2024. ADEM plans to incorporate the federal rule into its regulations once the LCRI is finalized.

Of immediate concern to public water systems is the service line inventory requirement of the LCRR. Community and non-transient non-community water systems must submit a complete inventory of all service lines connected to the distributions system, including both the public and the private side of the line. The applicable regulation for this requirement is at 40 CFR 141.84. On August 4, 2022 EPA released its *Guidance for Developing and Maintaining a Service Line Inventory*.

Service Line Inventory

Every community and non-transient non-community water system must submit a detailed service line inventory to ADEM by October 16, 2024. ADEM has developed a spreadsheet for water systems to use for their service line inventories; optionally, water systems may export data from other databases using our schema to upload to



<https://adem.alabama.gov/programs/water/drinkingwater/leadcopper.cnt>



The LCRI – Potential Actions

- Requiring replacement of all lead service lines
- Changes to tap sampling methodology
- Elimination of Trigger Level
- Lowering of Action Level
- Equity issues/disadvantaged communities
- Other(?)



One More Thing...

- Section 2106 of the Water Infrastructure Improvements Act for the Nation (WIIN) Act requires Tier 1 public notice for lead action level exceedances.
- This is a 24-hour notice.



PFAS



Proposed PFAS MCLs

- EPA announced proposed MCLs on March 14, 2023

Chemical	MCLG (mg/L)	MCL (mg/L)
PFOA	0	0.0000040
PFOS	0	0.0000040
PFBS, PFNA, PFHxS, HFPO-DA (GenX)	1.0 Hazard Index	1.0 Hazard Index

The Hazard index for an individual monitoring period is a weighted sum of the individual analyte averages over the monitoring period.

- All MCLs are based on a 4-quarter running annual average. Multiple results within each quarter are averaged for use in determining the running annual average.
- A trigger level is set at 1/3 the MCL and is used in determining eligibility for reduced monitoring.



Proposed PFAS MCLs

- EPA is targeting a finalization of the rule by the end of 2023.
- The rule must be complied with within 3 years of the federal rule being finalized.
- ADEM must adopt the rule and submit a package for primacy within 2 years of the rule being finalized; we expect to meet this deadline.



Resources for Water Systems

EPA PFAS NPDWR Site



<https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>

ADEM SRF Site



<https://adem.alabama.gov/programs/water/srf.cnt>



Consumer Confidence Reports Revisions



CCR Rule Revisions

- On March 28, 2023, EPA announced its draft Consumer Confidence Report Rule Revisions.
- Water systems should anticipate complying with the new rule by 2025 (2024 CCR).



CCR Rule Revisions

- Systems serving 10,000 or more required to deliver a 2nd CCR each year by December 31.
- Systems may mail a paper copy of the report, mail a link to the report, or email a link or report to the customer*.
- More information on lead, especially in instances of action level exceedances.



CCR Rule Revisions

- Various changes to required text.
- CCR must include description of how to obtain translation services for users with limited English proficiency (LEP).
- Systems serving >100,000 will be required to identify LEP populations in service area and develop plan to meet community needs.
- Water systems prohibited from making false or misleading statements in CCR. Ex: “water is safe”



Cybersecurity



Cybersecurity

- On March 3, 2023, EPA issued its infamous Cybersecurity Memo
- On June 20, 2023, ADEM Drinking Water Branch sent a memo to water systems outlining how it would implement the requirement.
 - EPA contractor, 3rd party, or self-assessment acceptable
 - Checked at sanitary survey
- **Memo was withdrawn by EPA October 11, 2023.**
- For now, ADEM will still ask to review cybersecurity audits. If no audit exists there will not be an adverse finding on the sanitary survey.



eMORS



EMORS - Overview

- Electronic entry and submission of Monthly Operational Report (MOR) data.
- Targeting a data model based on discharge monitoring reports (DMRs) under the NPDES program.
- Will exist within EDWRS
- Will use existing ADEM Web Portal credentials
- Development is underway with initial release planned for early 2025
 - 3 phases of development
 - Internal Administration Dashboard (v 1.0 to be released on 10/20/2023)
 - External Browser-based data entry (module within EDWRS)
 - External Mobile App* supporting daily data entry

*Mobile App may not be included in initial release.



EMORS – Features*

- Browser-based
 - Two options for data entry
 - Form-based daily data entry
 - Grid-based monthly data entry (copy/paste support planned, not currently planning import option)
 - Create monthly submission to ADEM by certifying summary data and completing required forms.
 - Ability to revise and resubmit data for a monthly report
- Mobile App
 - Entry of daily data in the field with support for limited or no connectivity
 - Access to “Reference” information (e.g., sample schedules)
 - Push notifications for upcoming or overdue reports.

*External applications are in the early development phase. Not all features listed, and some features listed may not be included as written.



Reminders



Water Storage Tank Maintenance

- 335-7-7-.04 – Effective April 14, 2022
- Systems must develop and implement a written maintenance plan, including an inspection/cleaning at least once every 5 years.
- Inspections must be performed by qualifying individual
- Final report must be detailed and include pictures and/or video
- Storage facilities must be taken out of service until all significant deficiencies identified during inspection have been repaired.



Contact Information

Please update your emergency contact information at:
<http://app.adem.alabama.gov/awecs>





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