



Massachusetts Water Resources Authority

# Regulatory Update

Stephen Estes-Smargiassi  
Director of Planning

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## Hot Topics in Rules

- Total Coliform Rule Revisions – “coming soon”
- Lead and Copper Rule: Changes and New Studies
- “Contaminants of the Day”
  - Manganese
- Change in Fluoride Dose
- Unregulated Contaminant Monitoring Rule (UCMR 3)
- Annual Water Quality Report



## Total Coliform Rule Changes Coming Soon

- EPA has revised the TCR
- Overall shift in focus
  - From: TC positives requiring public notification
  - To: Monitoring results triggering investigation and corrective action
- Benefits
  - More proactive approach to public health protection
  - Reduction in customer confusion associated with Public Notification actions for TC violations



## Overview of RTCR

- Use TC as part of an overall “treatment technique”
  - No MCLG/MCL for TC
  - TC 5% exceedance triggers assessment and corrective action (of any defect found)
  - Violation only if assessment or corrective action is not completed
- *E.coli* retains MCLG/MCL = 0
- Fecal Coliform no longer used
- Public Notification for failing to do assessment/corrective action or acute *E. coli* MCL violations



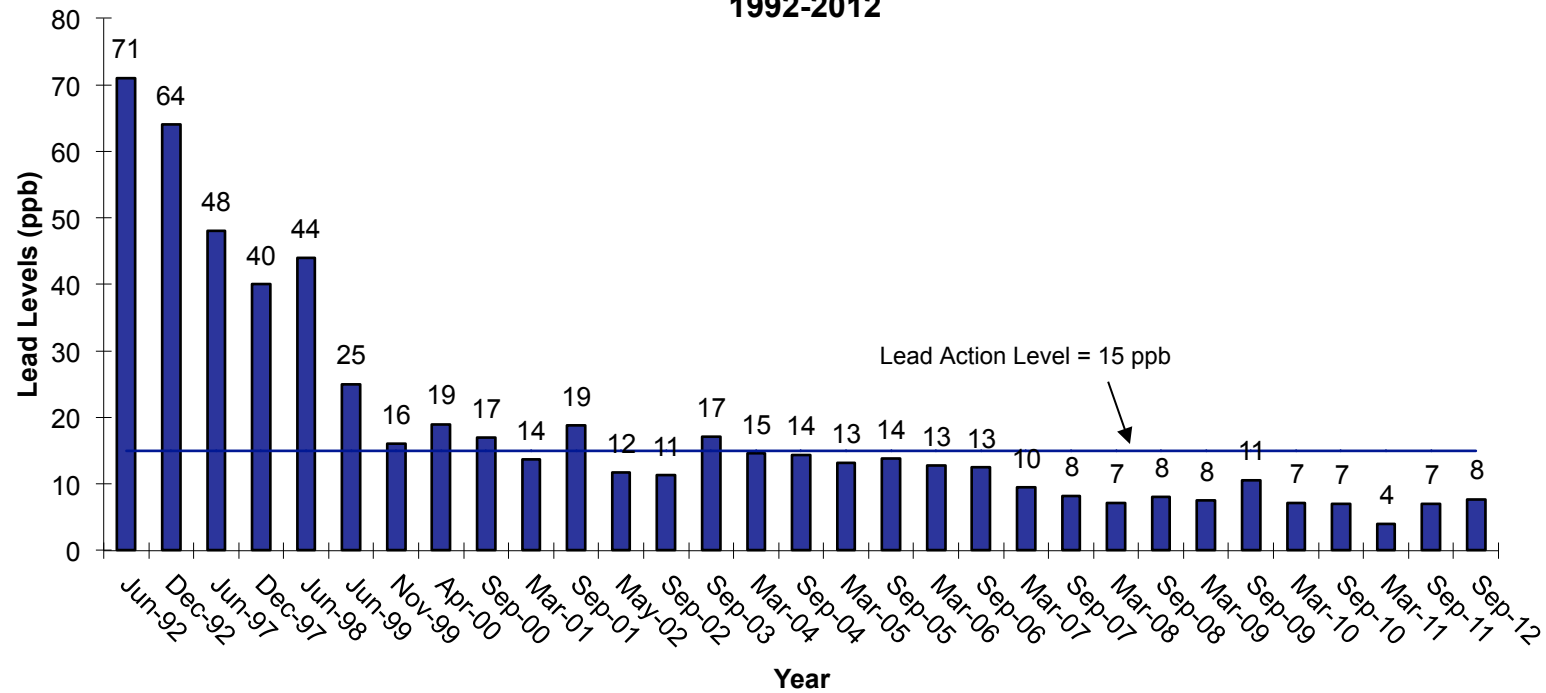
## Schedule for Implementation of RTCR

- EPA Requires that it be implemented no later than March 31, 2016
- Massachusetts DEP has indicated that it will implement early – perhaps as early as the end of 2013!
- How to prepare for RTCR:
  - Continue to monitor and closely examine all positive samples
  - Use DEP's draft assessment forms for any 5% exceedance
  - Provide DEP feedback on the forms
- If given chance, urge DEP to move quickly to implement the revised rule



# Continued good news on lead

**Figure 1 - 90% Lead Levels in MWRA System of Fully Served Communities:  
1992-2012**





## Major Changes to LCR Coming Soon

- Many issues identified in EPA sponsored workshops in 2004
- Ongoing research on corrosion, materials, benefits and risks of remedial actions
- Recent CDC and other health data
- “Case Studies” for actual community experiences
- May see draft revised LCR in 2014



## Lead Service Line Replacement

- Partial LSL replacement often occurs due to ownership (utility only owns to the curb stop)
- Research shows that with partial replacement lead levels in home do not drop significantly
- Levels rise dramatically right after, in both full and partial
- CDC Study: Kids blood lead levels elevated
- Science Advisory Board review
- Is there benefit from partial service replacement or should it be left alone?
- Better flushing guidance?
  
- Short term take-away – -more aggressive outreach and record keeping





## Lead in Brass

- New 0.25 lead content standard in California, Vermont and in January 2014, nationwide
- Opportunity for utility leadership
  - “get the lead out” sooner
- Cannot use old brass materials after January 2014
- Be sure your purchasing and engineering specs are up to date
- Check inventory – use up old stuff first



## Fluoride Dose Change?

- In January 2011, EPA, Dept of Health and Human Services and CDC issued draft recommendations to lower fluoride dose from 1.0 to 0.7 mg/l
- MWRA follows CDC guidance on fluoride
- Still awaiting final guidance from agencies
- MWRA will implement any recommended changes
- Rationale:
  - Many other sources of fluoride now
  - Potential for mild teeth staining
  - No change in basic health recommendation



## DEP Manganese Advisory and Sampling

- DEP considering issuing a health advisory for manganese
- Current aesthetic secondary standard is 50 ppb
- Considering HA of 300 ppb (target is infants drinking formula)
- Will likely require annual testing
- Will likely require CCR notice if above 50 ppb
- Will require some sort of public notification process if above 300 ppb
- MWRA is reliably below 50 (typically around 10 ppb)



## Unregulated Contaminant Monitoring Rule

- Requires monitoring for 28 chemicals and 2 viruses
- All systems over 10,000; sample of smaller systems
- Previously only MWRA required to sample
- Now each individual community is monitored
- MWRA is samplign for all fully supplied communities – first round was January 2103
- Expect to have some detects – to be reported in 2014 CCR
- We' ll keep you posted



## Consumer Confidence Report

- This Year's Theme –Tap Water and Public Access (fountains)
- Schedule and outreach same as previous years
- Will continue to do direct mailing of paper CCR (21¢ per copy)
- Best foot forward with community letter
- But, any NON's must be in letter
- And meeting info
- And lead and TCR data



# Questions or Comments?

- Stephen Estes-Smargiassi
- [smargias@mwra.state.ma.us](mailto:smargias@mwra.state.ma.us)
- 617-788-4303
- [www.mwra.com](http://www.mwra.com)

