

DOWN THE PIPELINE

VOLUME 10
ISSUE 3

December 30, 2019

EPA's Proposed Lead & Copper Rule Revisions

The Agency proposed overdue revisions on November 13, 2019 with a 60-day public comment period. EPA has a goal of issuing a final rule in the summer of 2020, ahead of the election.

Upon implementation there will be a 3 year window to reach compliance. This revision will affect utilities as well as homeowners. Within five years every school and day care center must be sampled for lead and every five years thereafter.

An inventory of service lines must be created within 3 years with annual updates.

If sample results show an exceedance of the new 10 part per billion trigger level then must meet the State's goal for lead service line

replacement. If the 15 part per billion action level is exceeded then there will be a mandatory 3% replacement rate utility-wide. It is expected that due to sampling changes that there will be more lead exceedances.

Filters for removing lead will be an option to line replacement for homeowners. But utilities will be required to provide public notice and to track lead filters.

This change may trigger more utilities beginning to

offer funding programs to homeowners. Funds for this can come from several potential sources, such as: federal loans and grants, rate revenue funding, private funding partnerships, etc.

The Water Authority would be required to send annual notices to homeowners with lead as well as provide 24 hour notice to all customers if lead exceeds 15 ppb action level.

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INDUSTRIAL PRE-TREATMENT PROGRAM

PUSH FOR METHODOLOGIES TO DETECT PFAS

PFAS, or polyfluoroalkyl substances, are being detected in more and more water sources all over the nation.

The state of New Hampshire has now set drinking water standards effective on September 30, 2019.

The EPA is now working on methods that labs can use to detect more of these substances for there is easily 6,000 compounds out in our environment. One new method is 8327 which will detect nearly 12 additional compounds. Right now there is the approved Method 537.1 for drinking water analysis (14 compounds detected). Draft Method 533 can detect 25 compounds and is expected to be finalized by year's end.

Some labs have extended Method 537.1 to analyze samples from surface water, groundwater and wastewater. But this approach is making it difficult to make comparisons between differences in adaptations of the method. There is also work afoot to develop "total" PFAS testing.

Where do these substances come from? They are found in firefighting foams, fire retardant clothing and furniture as well as carpeting. These substances contain a very strong carbon-fluoride chemical bond that resists biodegradation. They are desirable substances since one part repels water while another part repels oil. Now, studies are revealing that these substances may very well be causing illnesses and defects in genetic material.

EPA is working towards listing these substances under the federal regulation, CERCLA. If this rulemaking gets finalized the designation will have significant impacts for the substances will be classified as hazardous

substances which will trigger mandatory reporting.

What could be concerning to companies is the concept of "conduits" for the movement of these substances in our environment. A conduit would be any "party" that did not generate the PFAS but did use them on their products. It also would be wastewater treatment plants and drinking water facilities. The hazardous substance classification would also open the door to Superfund site clean-up designation which could be very expensive and lead to litigation.

EPA issued pre-publication notice on November 25, 2019 for publication in the Federal Register. There will be required reporting for certain PFAS under the Emergency Planning and Community Right-To-Know Act (EPCRA). This is commonly known as the Toxics Release Inventory.

In other parts of the country people are checking landfill leachate and biosolids for these substances. An example of this sort of effort is in Michigan. There 48 landfill sites are designated high priority for sampling, 43 sites of medium priority for sampling, and 43 more sites as low priority for sampling.

The main areas of concentrated PFAS are found at airports, military bases, and firefighter training centers where foam products are being utilized to fight fires.

Our society will continue to face more and more issues with chemical compounds that companies have created to manufacture "better" products for consumers to purchase and use in their homes and businesses.



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POLLUTION PREVENTION(P2): REVISITED FOR 2020

Periodically I post these reminders so that no one can say that they never knew that this sort of concept existed. So bear with me as I once again provide all of you with a review of pollution prevention.

P2 is the reduction or elimination of wastes and pollutants at their source/s. Pollution avoided is pollution that does not require treatment, management, disposal or clean up.

We have had a national policy since 1990 that states:

- 1) pollution should be prevented or reduced at the source whenever feasible;*
- 2) pollution that can't be prevented should be recycled in an environmentally safe manner when feasible;*
- 3) pollution that can't be prevented or recycled should be treated whenever feasible; and*
- 4) disposal or other release into the environment should be used only as a last resort.*

This means that the EPA continues to expect everyone to work at these four points whether as individuals or businesses.

P2 can encompass activities such as:

- 1) redesigning products to cause less waste or pollution during manufacture, use, or disposal*
- 2) altering production processes to minimize use of toxic chemicals.*

- 3) implementing better house-keeping practices to limit leaks and fugitive releases*
- 4) taking steps to reduce energy consumption*

EPA still defines pollution prevention as “source reduction.” So P2 can be thought of as source reduction; reducing generation of wastes or contaminants at the source, thereby reducing potential hazards to the environment and public health.

For a very long time the exclusion of out-of-process recycling from the above definition was a point of controversy. But with the advent of the ability to recycle process water after in-house treatment recycling has moved into the outskirts of P2. Now all recycling represents progress toward reducing environmental pollution and achieving greater efficiency in resource usage.

In this era of extreme concern over global warming and climate change, these concepts become even more important. P2 has an important role in efforts to achieve global sustainable development. All of us must reduce our overall environmental burden associated with meeting our needs and carrying out our activities and increase the efficiency with which we use raw materials and energy.

P2 is a great help in addressing multimedia concerns, since pollution that is never created can't be shifted from one environmental medium to another (air, water, and land).

To this end, EPA has enacted some federal legislation, such as the Emergency Planning

and Community Right-To-Know Act (EPCRA), which created the Toxic Release Inventory (TRI) program; the air toxics program and emissions trading system for coal-fired power plants.

The TRI program has empowered the public with knowledge of what companies in their communities are discharging into their environment. This has allowed the successful pressuring of industries to “clean up their act.”

To find more information on this subject one can either Google it or else visit the federal EPA website.

