

## Monitoring and Compliance The Rules

BECQ SDWP  
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May 1998 to 2016

## What is a Public Water System?

- A system that has at least 15 service connections or serves an average of at least 25 individuals daily for at least 60 days out of the year
- Community Water System (CWS)  
Apartment complex, Dormitories, or Barracks
- Non Transient- Non Community (NTNC)  
Schools, Restaurants or a place of work that has 25 or more people
- Transient Non- Community Water System (TNC)  
Fast food restaurants with less than 25 employees, Bars etc.

## Total Coliform RULE (TCR)

- **Applicable to all PWSs'**
- System submits 1 routine TC sample/ month  
Collects 4 Repeats if a routine is ( + )
- System submits 2 or more routine TC sample/ month  
Collects 3 Repeats if a routine is ( + )
- Any 1 monthly routine ( + ) = 5 temporary routines following month.
- How many ( + ) samples allowed? No more than 1 routine sample. Any more than 1 ( + ) is an MCL Violation.
- PWS submits 40/ month MCL is not more than 5% of total number of samples
- Bottle Water Co. Depends on system configuration plus + Random Sampling

## Phase II / V Rule

APPLICABLE to CWS & NTNC

- **4 CONSECUTIVE QUARTERS (Initial Monitoring )**
- $\text{NO}_3$  - Annually /MCL is 10 mg/l – SDWR
- $\text{NO}_3$  - Semi-annual – WD&WO Regulation/ All wells
- Voc - Every 3 years/ CWS & NTNC
- SOC - Every 3 years/ CWS & NTNC
- Metals – Every 3 years/ CWS & NTNC
- Pesticides- Every 3 years/ CWS & NTNC
- Herbicides- Every 3 years/ CWS & NTNC
- Carbamates- Every 3 years/ CWS & NTNC
- EDB & DBCP- Every 3 years/ CWS & NTNC
- Radionuclide- Every 4 years/ CWS & NTNC
- All TNC - only required monthly TC sampling &  $\text{NO}_3$  annually

## Lead & Copper Rule (Pb&Cu)

APPLICABLE to CWS & NTNC

- 100 or less population = 5 samples
- 101 to 500 population = 10 samples
- 501 to 3,300 population = 20 samples
- 3,301 to 10,000 population = 40 samples
- 10,00 to 100,000 population = 60 samples
- 100,000 or more population = 100 samples
- What determines # of samples for lead & copper? System size or population served

## Pb&Cu continued

APPLICABLE TO ALL CWS & NTNC

- **2 consecutive 6 month period (Initial Monitoring)**
- No action level exceedence after 2 consecutive six months, # of samples may be reduced to 1/2 10 to 5 or 20 to 10 etc.
- Annual for 2 more years for a total of 4 rounds
- One round every 3 years
- Action Level for Pb = 0.015 mg/l
- MCLG for Lead is zero mg/l
- Action Level for Cu = 1.3 mg/l
- Action Level is exceeded it triggers Corrosion Control Treatment/ WQP monitoring & Public Notice

### Disinfection Residuals/ Byproduct Rule (DDBP) TTHM/ HAA5

APPLICABLE to CWS, NTNC & TNC

- All systems that treat with chlorine
- PWS shall sample at a point in the distribution with the maximum residence time during the month with the warmest temperature
- Systems serving fewer than 500 must sample once per year per treatment plant (groundwater)
- MCL for TTHM is- 0.80 mg/l
- MCL for HAA5 is- 0.60 mg/l
- If your using Ozone for treatment then you must monitor for Bromate annually
- Primary health risk for Trihalomethenes-Cancer

### Reporting & Record Keeping

- Microbiological & Turbidity analysis reports shall be kept for no less than 5 yrs.
- Chemical analysis reports shall be kept for a period not less than 10 yrs.
- Records of actions taken by a PWS to correct violation shall be kept for not less than 3 yrs.
- Copies of written reports (Sanitary Survey) shall be kept for not less than 10 yrs.
- Copies of Public Notices issued shall be kept for a period of 3 yrs.
- Copies of monitoring plans (TCR, Pb & Cu) shall be kept for a period of 3 yrs.

### What do you do with the reports?

- All PWSs' are required to submit to the monitoring reports to the STATE (BECQ)
- All monitoring reports are due on the 10<sup>th</sup> of the following month after the compliance period
- TCR reports for Dec. 2015 are due January 10, 2016
- Phase II/V reports for 2015 are due on January 10, 2016
- Pb & Cu reports for 2015 are due on January 10, 2016 along with the 90<sup>th</sup> percentile certification (Form LCR-3) signed by the sampler and who ever did the 90% calculation.
- All CNMI PWS are on reduced monitoring of once every 3 years.

### Major Issues with Chemical Monitoring

- PWSs' wait until the last minute to request for work orders.
- PWS's wait until we call them to submit the reports
- PWS's rely on the SDWP to tell them what chemicals are due and when they are due.

Monitoring Summary for: Joe Kai's Water  
PWSID: MP0000000 SOURCE: Ground Water

Prepared January 14, 2016

Required Test	Sampling Location	Required Frequency	Current Status	
			Last Sample	Next Report Due
Total Coliform Bacteria	C016 D016 (24) L2	DS (per CSP)	1/2/16	2/2/16
Inorganics (7 contaminants)	C016 D016 (24) L2	EP	Once/3 yr compliance period	10/1/13
Inorganics (5 contaminants)	C016 D016 (24) L2	EP	Once/3 yr compliance period	12/2/13
Arsenic	C016 D016 (24) L2	EP	Once/3 yr compliance period	12/2/13
Nitrate	C016 D016 (24) L2	EP	Annually	12/2/15
Nitrite	C016 D016 (24) L2	EP	Once every 9 years	12/24/12
Nitrate	C016 D016 (24) L2	EP	Once every 9 years	12/24/12
Adhesives	C016 D016 (24) L2	EP	Once every 3 years	WASTED
Organic Pesticides	C016 D016 (24) L2	EP	Once every 3 yrs	12/2/13
Radionuclides	C016 D016 (24) L2	EP	Once every 4 yrs	12/2/13
Radium 226 & 228	C016 D016 (24) L2	EP	Once every 4 yrs	12/2/13
Volatile Organics	C016 D016 (24) L2	EP	Once every 3 yrs	12/2/13
TTHM & HAA5	C016 D016 (24) L2	DS	Annually or 3 years	11/19/13
Operator Certification	C016 D016 (24) L2	REQUIRED	WT Level 1 WD Level 1	REQUIRED
Consumer Confidence Report	C016 D016 (24) L2	EP	Annually	July 1, 2015
Lead and Copper	C016 D016 (24) L2	DS	Once every 3 yrs	12/2/13
Sanitary Survey	C016 D016 (24) L2	SYSTEM	Every 3 years	10/3/13