Stage 1 DBPR

Other Compliance Issues

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The First Year

- 141.133(a)(3): If during the first year of monitoring, any individual quarter's average will cause the running annual average to exceed the MCL, the system is out of compliance at the end of that quarter.

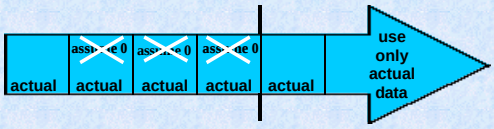
The First Year

To calculate RAA with less than 1 year of data:

- Assume best case (0 mg/L) for future results.
- Use available results and "best case" to compute RAA.
- Determine compliance as you would normally by comparing RAA to MCL.
- If any result would cause your RAA to exceed the MCL, you are out of compliance at that point.
- Once you have a year of data, you may not assume zeros.

The First Year

- Q1: Data for Q1 & assume 0's for Q2, Q3, & Q4
- Q2: Data for Q1 & Q2 & assume 0's for Q3, & Q4
- Q3: Data for Q1, Q2, & Q3 & assume "0" for Q4
- Q4+: Data for all quarters



Simultaneous Compliance

- Sampling Schedule
- PN Rule
- Lead and Copper Rule
- Total Coliform Rule
- SWTR/IESWTR/ LT1ESWTR

Lead and Copper Rule

- LCR compliance may necessitate increasing pH for corrosion control
- pH can increase TTHM levels
- Stage 1 DBPR compliance may necessitate changes to water chemistry or disinfection practices that affect LCR compliance

Total Coliform Rule

- Coliforms are inactivated through disinfection.
- May need to increase disinfectant levels to control microbial contamination events.
- May affect ability to comply with the MRDL.

LT1ESWTR

Long Term 1 Enhanced Surface Water Treatment Rule

- Follows framework of the IESWTR
- Applies to Subpart H systems serving < 10,000

LT1ESWTR

•Improves control of microbial pathogens, specifically *Cryptosporidium*

•Lowers turbidity levels

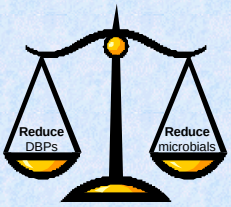
•Addresses risk trade-offs with DBPs

•Establishes individual filter effluent requirements

•Strengthens combined filter effluent requirements

LT1ESWTR & Stage 1 DBPR

LT1ESWTR will ensure that microbial protection is not jeopardized as systems comply with the Stage 1 DBPR



I. Competing Goals
- Reduce DBPs and disinfectants vs. maintain safe disinfection levels

II. Profiling & Benchmarking Requirements
- Consistent low levels of DBPs may allow systems to skip requirements

Upcoming Regulations

Stage 2 DBPR
- Proposed August 2003

LT2ESWTR
- Proposed August 2003

Ground Water Rule
- Proposed in 2000
- Anticipate final in Winter 2003