



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

APR 18 2017

MEMORANDUM

SUBJECT: Five Year Self-Inspection Requirements under the Aircraft Drinking Water Rule

FROM: Anita M. Thompkins, Director
Drinking Water Protection Division

A handwritten signature in blue ink, appearing to read "Anita M. Thompkins", is written over the printed name and title.

TO: Regional Aircraft Drinking Water Rule Program and Enforcement Managers

The purpose of this memorandum is to provide clarification on the Aircraft Drinking Water Rule (ADWR) requirements for five year self-inspections.

Pursuant to 40 CFR §141.806(c), §141.808(c), §141.810(d) and §141.810(e), air carriers must report a self-inspection to EPA within 90 days of completion. The report must include information on whether all deficiencies were addressed within 90 days after the identification of the deficiency, or where such deficiency was identified during extended or heavy maintenance, it must be addressed before the aircraft is put back into service. If the deficiencies identified during the inspection were not addressed within 90 days of finding the deficiency, the self-inspection report must include:

- Description of the deficiency;
- Explanation of why the deficiency has not been addressed;
- A schedule for addressing the deficiency as expeditiously as possible.

EPA developed the Aircraft Reporting and Compliance System (ARCS) to facilitate the reporting of aircraft public water system (PWS) data. ARCS is a centralized web-based data collection and management system that provides accountability and regulatory oversight.

On November 14, 2016, EPA updated ARCS to fully reflect the requirements identified in 40 CFR §141.806(c), §141.808(c), §141.810(d) and §141.810(e). Reporting violations were returned to compliance using the code EAX. The EPA Regional offices should not remove, reject or delete these compliance determinations, as these violations are valid, unless they are a result of data entry errors.

As a reminder, ARCS generates the following self-inspection potential violations:

Reporting:

- If a self-inspection is completed, but not reported in ARCS within 90 days of completion.
- If a deficiency is identified, but not reported within 90 days.

Treatment Technique:

- If a self-inspection is not completed by the five-year self-inspection regulatory deadline.
- If a deficiency is identified during the self-inspection, but not addressed within 90 days.

EPA hosted a webinar training on October 5, 2016 to inform the regulated community about the updated ARCS requirement. In addition, EPA held a presentation with air carriers during the November 2016 ADWR National Meeting in Texas.

For more information regarding the rule requirements discussed in this memorandum, please refer to the ADWR Guidance Manual and Quick Reference Guide Fact Sheet found on EPA's ADWR website: <https://www.epa.gov/dwreginfo/aircraft-drinking-water-rule>.

If you have any questions regarding this document or other regulatory requirements, please contact Maria Lopez Carbo, Chief at Lopez-Carbo.Maria@epa.gov.

cc:

Dawn Messier, Office of General Counsel
EPA Regional ADWR Coordinators
EPA Regional ADWR Enforcement Coordinators