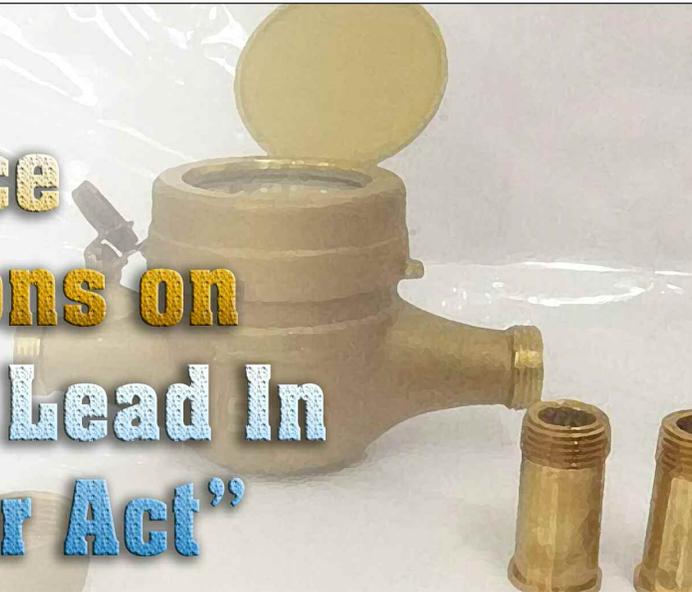


# EPA's Guidance Clears Questions on "Reduction of Lead in Drinking Water Act"



**A**lthough the time for comment will have passed by the date readers see this article, it is pleasing to learn that EPA's Guidance Document for Reduction of Lead in Drinking Water Act provides clarity for water systems. The frequently asked question concerning this new legislation was how strictly EPA would interpret the matter of repair of water meters that did not meet the new lead-free standard.

The regulation, Section 1417 (a)(1) of the SDWA states that "no person may use any pipe or plumbing fitting or fixture, any solder, or any flux, in the installation or repair of any public water system or any plumbing in a residential or nonresidential facility providing water for human consumption that is not lead free."

EPA has established that under this regulation, "lead free" means that solders and flux may not contain more than 0.2 percent lead; pipes, pipe fittings, and well pumps may not contain more than 8.0 percent lead; and plumbing fitting and fixtures must meet standards established under section 1417(e).

Many older water meters do not meet that standard. The Kansas Rural Water Association staff members do a lot of work for systems involving meter testing and repair. And while this new regulation has been discussed in prior KRWA magazine articles, a question remained about placing a meter back in service if it did not meet the lead-free standard.

The question, addressed directly by EPA in its guidance document, was as follows:

**Question: When a water meter needs repair, we typically remove the meter from service, repair it off site, and place the same meter back into service after it's been repaired. Does this meter now need to meet the new definition of lead free?**

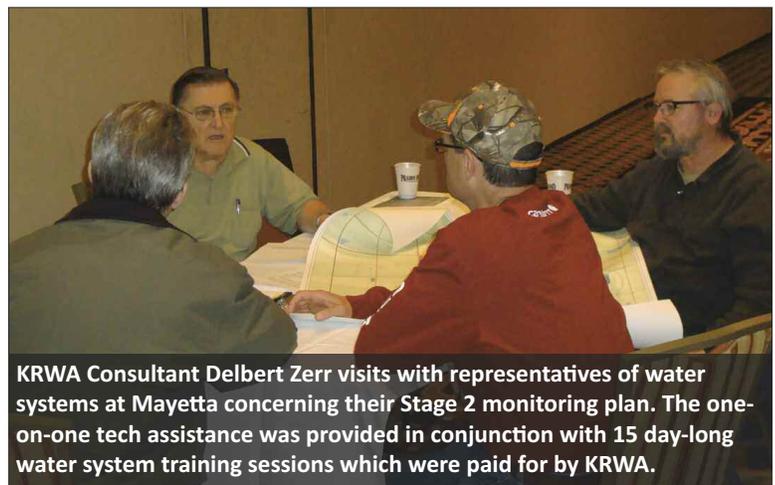
*Answer by EPA: No, but certain parts used in the repair may need to meet the definition. The removal from service of the fixture for repair and replacement, by itself, does not trigger the requirements of Section 1417(a). Any part used in the repair of the meter that is a pipe, pipe fitting, plumbing fitting or fixture must meet the new definition of lead free, but the meter being repaired is not independently subject to the requirements in 1417(a) because it is not being used or installed for the first time in that location.*

To put that in simpler terms, water systems will not be expected to replace meters when testing, repairing or recalibrating water meters.

Kansas Rural Water Association commented in favor of this interpretation; those comments were required for submittal by June 21, 2013. It is a relief for systems and KRWA to have this clarification of the new regulation.

Water meters that do not meet the new 'lead-free' standard are not to be installed after January 4, 2014. Meter manufacturers have been moving towards meeting this standard for several years so that new(er) meters should all meet the standard.

**Water systems will not be expected to replace meters when testing, repairing or recalibrating water meters.**



KRWA Consultant Delbert Zerr visits with representatives of water systems at Mayetta concerning their Stage 2 monitoring plan. The one-on-one tech assistance was provided in conjunction with 15 day-long water system training sessions which were paid for by KRWA.

**Training and Tech Assistance are KRWA's focus**

My main work at KRWA is to help schedule and facilitate training sessions, as well as provide a lot of assistance directly to water systems. KRWA has a long history of providing training sessions for water and wastewater systems in Kansas. KRWA supplements to direct costs of training sessions by infusing nearly \$60,000 of internal funding into the program every year. The result? Cities, rural water districts and other water systems get the advantage and have the lowest cost training possible. KRWA is not in the business of "selling training sessions."

I hope you will review the two-page display ad on pages 40 and 41 in this issue. The ad summarizes KRWA Training. KRWA has tracked every training session 1976. No other organization has provided water or wastewater system training to the extent KRWA has. KRWA conducts or facilitates training sessions across the state, often with two or three sessions on the same day. Cross connection control, electrical safety and maintenance, water rate setting, chlorination, and all types of maintenance issues have been attended by capacity audiences. Recently, new courses for administrative personnel in QuickBooks and Excel, word processing, etc. have all filled to capacity. KRWA is also going to ramp up even more training for small systems. Training is KRWA's mission and KRWA will provide the training that systems ask for, regardless of the topic.

This spring and summer, KRWA and KDHE are collaborating on at least 15 sessions on the Stage 2 Disinfection Byproducts Rule. I estimate that more than 400 water systems will attend those sessions. People will leave those workshops with their Stage 2 monitoring plan completed. These daylong combo sessions were held at Mayetta, Kingman, Salina, Iola, Dodge City and Hays. With nearly 800 systems required to complete a Stage 2 monitoring plan, there are still many systems that will need to be contacted and helped so they meet EPA's October 1 deadline. Additional help may be provided at other regional meetings that KRWA is considering.

I encourage anyone who has an interest in a particular topic for a training session to



**Andrew Hare, KDHE, Topeka, and J. P. Goetz, KDHE, Wichita, work with Karla Pierce, city of Hutchinson, in developing the city's Stage 2 compliance monitoring plan.**

contact me at gmetz@krwa.net or call the KRWA office at 785-336-3760 to discuss your suggestions. Otherwise, always check the KRWA training calendar at [www.krwa.net](http://www.krwa.net) and then under "Training". Always check the KRWA Web site to verify which sessions are set or being planned by KRWA.

**KRWA is also going to ramp up even more training for small systems. Training is KRWA's mission and KRWA will provide the training that systems ask for, regardless of the topic.**

*Greg Metz joined KRWA as a Technical Assistant in July 2009. He previously worked at the city of Washington for 13 years where he was involved in city utilities including the power plant, streets, water and wastewater. He also served as purchasing agent for those utilities.*



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