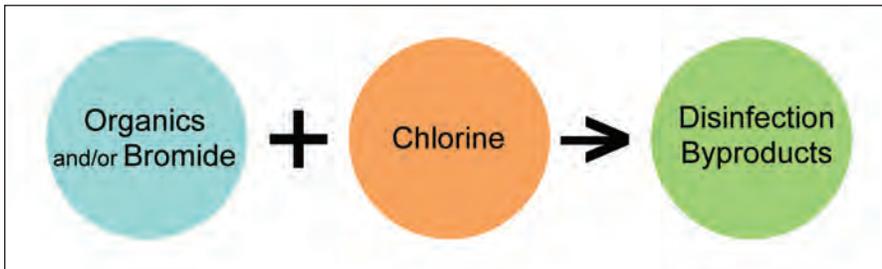




# Tell The Story: Our Drinking Water Quality is Great!

**T**he drinking water regulations are numerous, complex, and sometimes do not make sense to customers or water systems that have to report the testing results. It is especially true in the area of monitoring requirements and providing public notice.

Sometimes the Kansas Department of Health and Environment (KDHE) requires public notice when the water quality is good. One



example is when the water has been not monitored according to specific regulations. A small water supply recently had to issue a required public notice; some of the required language about health effects could cause undue concern.

### Disinfection Byproducts (DBPs)

The small water supply has a well water supply and monitors disinfection byproducts (DBPs) on a yearly basis in July; the monitoring began in July 2014. This monitoring requirement is a reduced monitoring requirement due to the low trihalomethanes (THMs) and low haloacetic acids (HAAs) in the drinking water.

The THMs and HAAs for this water supply are among the lowest in the state. This is quite common for the high quality groundwater in

**This is quite common for the high quality groundwater in Kansas and this high quality is expected and shown in most groundwater supplies in Kansas.**

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Kansas and this high quality is expected and shown in most groundwater supplies in Kansas. The table to the right summarizes the data for this water supply.

### Failure to Monitor Violation

In late November 2017 KDHE notified the water supplier of a “Failure to Monitor” for not completing mandatory monitoring in July. KDHE required public notice by mail or hand delivery to all customers. KDHE also required a “Certificate of Delivery” of the public notice be submitted to KDHE. KDHE also stated that failure to address the non-compliance may result in additional enforcement action.

The KDHE notification also required that the notice include, “Any potential adverse health effects from the violation or situation, using standard language provided in the Rule”.

The KDHE notification required the standard language that is, “This is not an immediate risk. If it had been you would have been notified immediately. *However, some people who drink water containing trihalomethanes and/or haloacetic acids in excess of the MCL over many years may experience problems with their liver, kidneys, or central nervous systems, and may have an increased risk of getting cancer,*” (italics are in KDHE notification).

Thus, a public notice was required because monitoring occurred in August instead of July and adverse health effects language was required. Based on the past analyses of this water supplier and the past analyses of many other such water supplies in Kansas, it is obvious that if the water been monitored in July, the THMs and HAAs analyses would have been essentially the same as the August analyses.

### Tier 3 Violation

Violations of drinking water regulations are categorized into three groups each with its set of public notice requirements. They are Tier 1, Tier 2, and Tier 3. Tier 1 is for the most important violations and Tier 3 is the least severe. The “Failure to Monitor”

Water Supplier with Wells		
	Trihalomethanes (THMs)	Haloacetic Acids (HAAs)
Date	ug/l	ug/l
August 4, 2003	n.d.	n.d.
July 31, 2006	n.d.	n.d.
July 27, 2009	9.6	n.d.
August 6, 2012	n.d.	n.d.
July 8, 2014	12.0	3.2
July 14, 2015	7.8	n.d.
July 19, 2016	7.7	2.6
August 21, 2017	7.7	2.5
<b>Maximum Contaminant Level (MCL)</b>		
	80.0	60.0
n.d. = none detected		
Analyses by KDHE laboratory		

### Additional Information Helps . . .

KRWA suggested that additional information be included in this system’s public notice. Without more details, many citizens might believe that their water system was providing water that is not safe to drink or poor quality. The fact that the water system is sending notices creates unnecessary alarm in the minds of citizens and undermines confidence in the drinking water. In this case, there was not and never has been any compliance matter with the quality of the water; the system is being penalized and the citizens unnecessarily alarmed for submitting samples 26 days after the date that was scheduled on an annual basis.

### Important Information About Drinking Water in (Name of System)

(Name of system) is required to monitor the drinking water for specific contaminants on a regular basis. Results of the regular monitoring are an indication of whether or not the drinking water meets health standards.

During year 2017, (name of system) was required by federal regulation to sample the water for disinfection byproducts of haloacetic acids (HAA) and total trihalomethanes (TTHM) in the month of July. The sample was inadvertently collected in August instead of July.

The maximum contaminant level (MCL) for haloacetic acids (HAAs) is 60 ug/l. The August sample had 2.5 ug/l.

The maximum contaminant level (MCL) for trihalomethanes (THMs) is 80 ug/l. The August sample had 7.7 ug/l.

These are very low levels of these contaminants. The monitoring results for (Name of system) from the prior years also show very low levels.

Year	HAA	TTHM
2014	3.2	12
2015	none detected	7.8
2016	2.6	7.7

The drinking water provided by (name of system) is very high water quality.

Based on past sample results and other groundwater supplies in Kansas, it is the opinion of (name of system) that the HAAs and TTHMs in our August sample would have been just as low and excellent if the water sample had been taken in July.

violation of this water supplier was a Tier 3 violation. It is noted that in this case the failure was to not monitor in the correct month but the drinking water was monitored 21 days later.

Federal regulation 40 CFR 141.205 requires that health effects language be included in public notices that involve maximum contaminant level (MCL) violations and treatment technique violations. There were no such violations in this water supplier's case.

The same regulation requires the following language for monitoring violations: "We are required to monitor your drinking water for specific contaminant on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During July 2018, we did not monitor for disinfection byproducts and therefore cannot be sure of the quality of your drinking water during that time". (KRWA edited for this water supplier.)

Unfortunately for this water supplier, KDHE does require adverse health effects language for monitoring violations even when the drinking water had been monitored the next month and is very good quality.

Ironically, many water suppliers had much, much higher DBPs and do not have to issue public notices. For instance, a very large city in Kansas has THMs averaging 50 ug/l and HAAs averaging 56 ug/l during the same July-August time

**The monitoring violation for this water supplier had no effect on drinking water quality.**

with even higher values earlier in the year. Yet that city is not required to issue public notice with adverse health effects language.

**Get the Word Out**

KDHE requires specific language in public notices. That does not prohibit a water supplier from providing additional information so that the customers know

more about the drinking water quality.

The monitoring violation for this water supplier had no effect on drinking water quality.

KRWA recommended that additional information on monitoring results for DBPs be provided by this water supplier. That language is in the side bar on the preceding page.

Should your water supply be required to provide a public notice, be sure you understand why and how to accomplish that. Also KRWA suggests that you use the public notice as an opportunity to tell your story about your very good drinking water quality.

*Pat McCool has worked as a consultant to KRWA since January 2004. He previously worked for KDHE for 30 years. Pat has a bachelor degree in Chemical Engineering and a masters degree in Environmental Engineering from the University of Kansas.*



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