

# KRWA Takes Positions on Water Supply Issues

**B**eginning in August of 2019, KRWA joined the American Council of Engineering Companies of Kansas (ACEC of Kansas) in discussing mutual concerns of both organizations concerning public water and wastewater supplies in Kansas. ACEC of Kansas is the trade association representing private consulting engineering firms doing work in the State of Kansas. KRWA and ACEC's goal was to bring attention to issues that both systems and consultants had.

## What happened?

Following some inquiry, in September KDHE invited stakeholders to a meeting where those such as larger and small water system representatives and industry organizations could discuss the topics that were of concern. KRWA was represented at this discussion by Delbert Zerr, KRWA Consultant, and Bill Shroyer, KRWA Director. In October, KDHE invited organizations and water systems to be involved in an advisory group on operator certification. Delbert Zerr and Greg Metz, KRWA staff member, participated in that meeting.

I want to take this article to recap the topics that KRWA raised and were discussed.

**Plan review:** The current plan review requirements are burdensome

because of the length of time to obtain approval. Both engineering firms submitting plans and systems that are waiting to start projects have voiced concerns of the long wait in gaining approval from KDHE. In fact, in many cases, maybe most cases, systems are waiting to start projects that are the result of requirements by the KDHE to achieve compliance with drinking water standards. These include:

**Water line extensions:** By placing these projects in line as they are received by KDHE, with the current back log, systems are sometimes waiting long periods of time to start what typically are fairly simple projects. KRWA pointed out to KDHE representatives that the review of water line extensions is not required by statute. KDHE, however, has made the decision that plans and specifications for these projects must be submitted for review. KRWA suggested ways to streamline this process. KDHE recently suggested that systems having their own engineer on staff would not need to submit plans for review. KRWA countered that a community that has an engineer under contract should be given the same consideration.

**Projects regarding a simple change of chlorine type:** This is another area where long delays in gaining approval causes systems to wait to make a change, sometimes when a change is

needed to comply with KDHE requirements. These include changing from gas chlorine to solution feed where the system is concerned about safety. Some systems, especially smaller systems, are concerned about the hazards of gas chlorine and prefer to change to liquid chlorine solution. This change is a rather simple change and systems should not have to wait to do so. The result is what is considered an unnecessary expense for water systems.

Changing from free chlorine to combined chlorine is another area that waiting for approval just causes systems to continue with free chlorine throughout their system resulting in high disinfection byproducts. The EPA has a maximum limit for these byproducts and requiring systems to wait for approval results in customers to be exposed to these carcinogenic byproducts longer than necessary. Changing from free chlorine to combined chlorine, which simply involves adding an approved form of ammonia, is not that difficult, especially with assistance from the KRWA. Systems could easily move forward with these changes either on their own or with the assistance of KRWA staff and could do so without long waits for approval. KRWA has had great success in installing chlorine feeding equipment and chlorine booster stations in the past.

**Operator certification:** This program is one that systems and operators are finding difficult to deal with. Systems that lose operators must notify KDHE when an operator is lost. Small systems can and often do receive an Operator-In-Training (OIT) certificate which satisfies the state and federal requirements. Systems with

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more complicated treatment though generally will not receive an OIT and will be required to hire a certified operator. The problem is that many small communities may not find it possible to hire a certified operator. Certification of operators is one of the criteria that will provide assurance that plant operations are performed properly. There are times though when the requirement to hire a certified operator just can't be met. It would seem that most of the systems that have complicated treatment plants also have other employees who are properly trained and can operate the plant until someone can become certified. Operator certification requirements are federally mandated for public water systems but not for wastewater systems. Certification of operators for wastewater systems is a State of Kansas mandate. In the most recent meeting of the advisory committee, KDHE agreed to separate surface water and groundwater test questions. KRWA's board of directors recently voted in support of KDHE's position of only requiring a Class 1 certification for groundwater systems, regardless of the population served. While some larger systems may want to have their operators attain a higher level of certification, those systems can do that through training programs and exams such as the Sacramento Operator Course or ABC Distribution System Course. Having multiple exams for groundwater only increases the burden on KDHE to provide a myriad of additional exams. Another request by KRWA was to allow anyone who

wishes to take the operator certification exam. This would help new people to have status when applying for employment. Presently, staff members who work at KRWA and who have 30 years of experience at KDHE are not allowed to take the exam.

**Lead and copper:** The issue of lead and copper has received much attention in recent years. No, Kansas is NOT Flint, Michigan! Copper seems to be the most common exceedance in Kansas and the most common treatment option is to install phosphate feeding equipment. The application of this product is advertised as laying down a thin film or coating on the inside of metal pipes thereby protecting the metal from aggressive water. For many years, the addition of this equipment was simply done by the system or the chemical supplier. It involves installing a solution pump to pump phosphate solution from a plastic barrel into the water line. Suppliers set up pilot plants to ensure that good results are attained. KDHE now

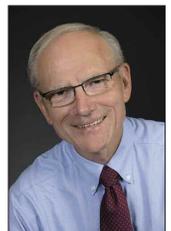
**The questions on the exams need to match the work experience of operators. This issue has been a discussion within and outside of KDHE for many years.**

requires the submittal of plans and specifications when these projects are needed. Again, gaining approval may take a long time but more importantly, it results in a much greater cost to the system as they must hire a licensed engineer just to have a stamped set of plans. Ironically, the first treatment option the engineer will often consider will be phosphate treatment. The engineer will typically contact the supplier; the supplier will provide the drawings; then the engineer will submit the package to KDHE.

In summary, the examples shown here are frustrating to many systems and engineering firms. The certification of operators is a long-term program that started as a voluntary program until it became mandatory in the mid-1970s. Both the drinking water and wastewater programs were state programs until the early 1990s when certification of operators for drinking water systems became federally-mandated. There is a recognized need to separate the exams between surface water treatment and those that use groundwater as water supplies. The questions on the exams need to match the work experience of operators. This issue has been a discussion within and outside of KDHE for many years. KRWA suggests that a group of experienced operators or technical assistance providers could easily sort the questions out in a matter of a couple hours.

Last, it's good to have lines of communication established concerning these matters. The goal is to find reasonable accommodation for doing what is necessary but to not have that be any more complicated than necessary.

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