

Nevada Certified Drinking Water Operator's Forum Minutes

Summary minutes of the meeting of September 16, 2009

The meeting began at 10:03 a.m. in the Nevada Department of Conservation 2nd floor Conference Room, 901 S. Stewart Street, Carson City, Nevada.

Videoconference to: NDEP Las Vegas Office, and Great Basin College
Red Rock Conference Room 1500 College Parkway
2030 E. Flamingo Rd., Suite 230 Lundberg Hall, Room 114
Las Vegas, NV Elko, NV

Phone conference to: 1-888-363-4734, access code 1515199

1. Call to Order (Chairman Cameron McKay) and introductions

Members Present: Cameron McKay (Chairman); Harvey Johnson; Bob Foerster; Lynn Forsberg (Elko video-conference); Marcellus Jones (Las Vegas)

Members absent: Chet Auckley; John Hulett

Representing the Nevada Division of Environmental Protection (NDEP), Bureau of Safe Drinking Water (BSDW): Jennifer Carr, Bureau Chief; and Nan Paulson, Administrative Assistant

Telephone attendance: Delite Travis (AWWA); Gina Enriquez (AWWA)

Guests: Jim Kerr (Elko County); Tom Georgi (LVVWD); Mike Workman (Lyon County Utilities); Greg Reed (RHGID); Patty Lechler (NDEP SDW); Charles Dettling (Summit Engineering Corp)

2. Approval of Minutes –June 24, 2009 Meeting

Motion: Chairman McKay moved to approve the minutes as presented, the motion was seconded by Bob Foerster, and the vote was unanimous in favor.

3. Report on Exam Analysis for June 2009

Jennifer Carr reviewed the mastery statistics reports from the June exam and talked about her concerns with operators low passing rates in areas of disinfection, water quality, and regulations. Operators were not mastering the disinfectant component and struggled in water quality. For example, in one test category, knowledge in drinking water regulations was at 0%. This is a concern because when an operator tests for a D-4, they will find that 10% of the test pertains to regulations. Tom Georgi acknowledged a need for better mastery among the higher level certificate holders.

Jennifer continued by telling the members that Chemical Treatment was consistently low, Residual Chem and Safety and Security scores were low for higher level certifications. Cameron McKay agreed there needs to be more training for Security.

Lynn Forsberg noted that there is very little study material referring to drinking water regulations. Delite Travis offered that they could note the importance of studying on the AWWA website. She mentioned that they do have study materials available, also. Lynn suggested more focus be put on regulations so the operators understand compliance rules.

Patty Lechler asked if the NRWA focuses their training on the test results. Bob Foerster said their training does cover a spectrum of the items on the tests. They do use the test results as input when developing the class focus.

Cameron McKay requested the test result stats be broken down by geographic location if possible, and a list be made advising the number of times operators are taking the exams. Jennifer Carr noted that the locational information cannot be gleaned from the information the State receives from AWWA. Delite Travis offered to look into what ABC can provide for information by location. Bob Foerster said the exam exit questionnaire will be given at the September test and the operators are asked how many times they have taken that exam. That information should be available soon.

Charles Dettling asked if the members would find out which grades are tested for and failed repeatedly. Bob Foerster said he will get that information. Jennifer Carr noted that the information could be pulled from the NDEP database.

Lynn Forsberg discussed that the Grades III and IV need more training, as they show the other operators what to do and why they need to do it. Operators use the systems in ways in which they are familiar. Cameron McKay agreed and added that the older operators need to teach the newer operators how to do calculations and not just rely on experience in operating a system. Mike Workman expressed concern that this is becoming a lost skill.

4. 2010 Proposed Test Schedule (Nan Paulson)

Nan Paulson talked about the current test schedules and timelines, and changing the June and September test dates out a week or two. The proposed dates would be March 12th, June 21st and September 29th. This move will allow operators a little more time to apply to retest or to test for the next grade after learning of their test results from previous test.

Delite Travis asked that the September test not be on the 29th due to the AWWA prepping for their Fall Conference that is held during the first week of October. Jennifer Carr and Delite Travis agreed to discuss the test dates and find ones that would work for all entities.

Cameron McKay stated that the Forum does not need to agree to specific dates; BSDW can make that decision.

5. Training Reciprocity with Surrounding States (Lynn Forsberg)

Lynn Forsberg talked about the difficulty in getting operators to economical training within a reasonable travel distance. He used American Backflow Prevention Association (ABPA) training in Salt Lake City as an example. Their course is a standard 40 hour course that is rigorous and has a hands-on element, but it is not recognized by Nevada regulations. Lynn added that Utah has contact hour classes along their Western cities that Eastern Nevada operators might be able to attend. Jennifer Carr said she can work with Utah CEU providers to certify classes as approved for Nevada.

Greg Reed mentioned that the ABPA program is different than the AWWA, and their hands-on testing protocol is different. Delite Travis added that the specific details of the differences are not available at that moment, but the AWWA program is being validated at this time and will be more rigorous. This

should be complete in about 6 months. She recognized that there is a difference, but did not have the specific details.

Concern was expressed by Lynn Forsberg relating to operators who request backflow device testing service in Jackpot and certified testers come in from Idaho or Utah, who use ABPA and not AWWA. He asked if they would not qualify to test in Nevada if they are ABPA certified. There are three testers who have gotten ABPA certified in Utah. If they have to have the CA-NV AWWA section certification, this will need to be worked out. Delite Travis said the AWWA would proctor test anywhere with a minimum of 10 tests. The AWWA would have to look at the curriculum. For training to be approved as post secondary, it must be IACET approved.

Lynn Forsberg said he might have six people to test at Elko County. It is hard for Elko County and other East side cities to get to Incline Village or Rancho Cordova, CA in a timely fashion. Utah is offering training, but they charge \$50 extra per person for non-members. Delite suggested operators take classes at the college in Elko.

Greg Reed asked how Nevada handles California Operator reciprocities since California has five grades. Jennifer Carr told him that Nevada drops a grade from the CA operator's ranking. The program also retains a list of states that Nevada recognizes for reciprocity. Jennifer said she intends to eventually have Steve Brockway's replacement check with other states to see how they rank plants and re-visit these other State's programs to ensure that they were still as stringent, or more stringent, than Nevada's program. Greg agreed that having specific guidelines would be good.

Mike Workman concurred with Lynn's comments about allowing ABPA certification. This needs to be clear so the Elko County employees do not get a Utah ABPA certification only to find out that it cannot be used for NV. He has staff looking to get dual certified.

Jennifer Carr agreed that there needs to be a concerted effort to find out what the differences are. She will support pursuit of a regulation amendment if it can be demonstrated with confidence that there is enough similarity in the programs.

Cameron McKay asked for volunteers for a workgroup to investigate this question. Bob Foerster, Mike Workman and Lynn Forsberg volunteered to study and compare the ABPA and AWWA programs. AWWA offered to assist. This will be revisited at the December meeting.

6. Groundwater Rule – NDEP Update and What PWSs Are Saying (Patty Lechler)

Patty Lechler spoke on the Groundwater Rule. She is the supervisor of the Public Water System Compliance Branch in the Bureau of Safe Drinking Water. An outline of her talk is attached.

Patty introduced the Groundwater Rule (GWR) Basics:

*The 1996 Amendments to the Safe Drinking Water Act required EPA to develop regulations that require disinfection of ground water systems “as necessary” to protect the public health. *The Ground Water Rule (GWR) promulgated in the Federal Register on November 8, 2006 does not require disinfection for all GWS, rather, it establishes a *risk-targeted approach* to identifying GWS at risk of microbial contamination. This at-risk subset of universe of GWS will then be Targeted to take corrective action – disinfection**

may be an appropriate corrective action. The Rule *builds upon drinking water programs - the Total Coliform Rule (TCR) and the Sanitary Survey Program* to identify ground water systems at risk of fecal contamination.

Patty said the Compliance Branch mailed letters to operators but have not had many calls in response to them. Staff realize there will be a lot of communication with water systems about the rule requirements.

Water systems should have a communication plan in place in the event of a positive Coliform and E. coli test. Some systems are setting up triggered monitoring. These can be submitted at any time but must be sent in and approved by the December 1, 2009 deadline.

Patty advised the members that a lot of information is available on the EPA website. Andy Asgarian in the NDEP Las Vegas office is a good point of contact.

Jennifer Carr pointed out that the NDEP BSDW received an extension on adopting regulations and submitting primacy provisions. The Bureau will be working on regulations amendments in early 2010.

7. NDEP Operator Certification Position (Jennifer Carr)

Jennifer announced the hiring of Steve Brockway's replacement. Duncan Wright has accepted the position and joins us from Maricopa County, Arizona's drinking water program. Duncan is a certified T-2 operator in the State of Arizona. He grew up in Nevada and attended UNR.

8. Member's Open Comments

There were no member comments.

9. Public Comments

There were no public comments.

10. Upcoming Meetings

a) Re-Schedule December Meeting (DCNR Room not available);

The December meeting was re-scheduled to meet on Wednesday, December 9, 2009 at 10:00 a.m. at the DCNR 2nd floor conference room.

b) March Meeting at NvRWA Conference (March 9-11, 2010)

11. Adjourn Suggested by: Cameron McKay; Time: 11:38 a.m.

Ground Water Rule Implementation

GWR Basics

- *The 1996 Amendments to the Safe Drinking Water Act* required EPA to develop regulations that require disinfection of ground water systems “as necessary” to protect the public health. *The Ground Water Rule (GWR)* promulgated in the *Federal Register* on November 8, 2006 does not require disinfection for all GWS, rather, it establishes a *risk-targeted approach* to identifying GWS at risk of microbial contamination. This at-risk subset of universe of GWS will then be Targeted to take corrective action – disinfection may be an appropriate corrective action. The Rule *builds upon drinking water programs - the Total Coliform Rule (TCR) and the Sanitary Survey Program* to identify ground water systems at risk of fecal contamination.
- Elements
 - Sanitary Surveys
 - Triggered Source Water Monitoring
 - Assessment Monitoring
 - 4 Log Virus Treatment including Compliance Monitoring
 - Corrective Actions
 - Public Notice

Determining Risk

- Sanitary Survey
 - Significant Deficiencies
- Triggered Source Water Monitoring
 - Notified of TC-positive TCR sample
- Assessment Monitoring

Implementation

- Groundwater System Decisions (prior to Dec.1, 2009)
 - Triggered Monitoring
 - Triggered Monitoring Plans
 - 4-Log Treatment of Virus with Compliance Monitoring
 - >3,300 continuous monitoring
 - ≤3,300 daily grab during peak flow or continuous
 - State approval to discontinue 4-log treatment/compliance monitoring

Corrective Actions

- Significant Deficiency
- Fecal Indicator Positive Source Sample (*E.coli*)
 - Correct all significant deficiencies
 - Provide an alternate source of water
 - Eliminate the source of contamination
 - Provide treatment that reliably achieves at least 4-log treatment of viruses using inactivation, removal or state approved combination of inactivation and removal at or before the first customer.

Violations

Treatment Technique Violation

- Failure to comply with corrective action
- Failure to maintain 4-log treatment and not corrected with 4 hours.

Monitoring Violations

- Source water monitoring requirements
- Compliance monitoring requirements

Public Notification

- Tier 1 for source water fecal indicator positive source sample (*E.coli-positive*)
- Tier 2 for Treatment Technique violations
- Tier 3 for Monitoring Violations
- Special Notices for uncorrected significant deficiencies at the end of the calendar year.