

Appendix A

Primacy Revision Crosswalks

The Primacy revision crosswalk for the Stage 1 Disinfectants/Disinfection Byproducts Rule (Stage 1 DBPR) is presented on the following pages and includes the amendments published on January 16, 2001. Regulatory language which was amended on January 16, 2001 appears underlined in the following table.

Under 40 CFR 142.12, states must adopt the requirements of the Stage 1 DBPR within 2 years of the final rule's publication, or by December 16, 2000. While states may find it easier to combine the amendments to the Stage 1 DBPR with the original Stage 1 DBPR, the amendments must be adopted within 2 years their publication or by January 16, 2003.

Please note there have been many changes to the Public Notice (PN) and Consumer Confidence Report (CCR) rules since the publication of Stage 1 DBPR. Additional information on these changes is available at www.epa.gov/safewater/pn.html and www.epa.gov/safewater/ccr1.html.

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PRIMACY REVISION CROSSWALK FOR THE STAGE 1 DBPR

FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	EPA COMMENT
SUBPART A—GENERAL				
§ 141.2 DEFINITIONS				
Enhanced coagulation	§ 141.2	NAC 445A.4525 adopts by reference 40 CFR 141.2, which includes the federal definition. NAC 445A.453- Primary standards: Requirements.	No	OK
Enhanced softening	§ 141.2	"	No	OK
GAC 10	§ 141.2	"	No	OK
Haloacetic acids (five) (HAA5)	§ 141.2	"	No	OK
Maximum Residual Disinfectant Level (MRDL)	§ 141.2	"	No	OK
Maximum Residual Disinfectant Level Goal (MRDLG)	§ 141.2	"	No	OK
Subpart H Systems	§ 141.2	"	No	OK
Specific Ultraviolet Absorption (SUVA)	§ 141.2	"	No	OK
Total Organic Carbon (TOC)	§ 141.2	"	No	OK
SUBPART B—MAXIMUM CONTAMINANT LEVELS				
§ 141.12 MAXIMUM CONTAMINANT LEVELS FOR TOTAL TRIHALOMETHANES				
Maximum contaminant level for TTHM applies to Subpart H CWSs that serve 10,000 or more people until <u>December 31, 2001</u> ; level applies to ground water CWSs that serve 10,000 or more people until <u>December 31, 2003</u> .	§ 141.12	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements	No	OK

SUBPART C—MONITORING AND ANALYTICAL REQUIREMENTS

§ 141.30 TOTAL TRIHALOMETHANES SAMPLING, ANALYTICAL AND OTHER REQUIREMENTS				
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
Compliance with §141.12 shall be based on running annual average of quarterly samples collected by the systems as prescribed in (b)(1) or (2)	§ 141.30(d)	NA	§ 141.30 is no longer applicable. Please see original primacy package submittal for historic regulatory authority.	OK
<u>Sampling and analysis made pursuant to this section shall be conducted by one of the total trihalomethanes methods as directed in § 141.24(e), and the Technical Notes on Drinking Water Methods, EPA- 600/R-94-173, October 1994</u>	§ 141.30(e)	NA	"	OK
Before a CWS makes any significant modifications to its existing treatment process for the purposes of achieving compliance with §141.12 the systems must submit and obtain state approval of a detailed plan setting forth its proposed modification and those safeguards that it will implement to ensure that the bacteriological quality of the drinking water served by the system will not be adversely affected by the modification	§ 141.30(f)	NA	"	OK
Requirements in (a) through (g) apply to Subpart H CWSs that serve 10,000 or more people until December 31, 2001; requirements in (a) through (g) apply to ground water CWSs that use a disinfectant and serve 10,000 or more people until December 31, 2003.	§ 141.30(h)	NA	"	OK

SUBPART D & SUBPART Q—REPORTING, PUBLIC NOTIFICATION AND RECORDKEEPING

NOTE: If the revised PN rule, published on May 4, 2000 (65 FR 25981), has already been adopted, the state is not required to adopt §141.32(e)(10). The revised PN rule supersedes §141.32. If the revised PN rule has not been adopted, the state must satisfy §141.32(e)(10).

§ 141.32 PUBLIC NOTIFICATION				
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For violations of the MCLs of contaminants and MRDLs of disinfectants that may pose an acute risk to human health, by furnishing a copy of the notice to radio and television stations serving the area served by the PWS as soon as possible but in no case later than 72 hours after the violation	§ 141.32(a)(1)(iii)	NA	§ 141.32 is no longer applicable. Please see original primacy package submittal for historic regulatory authority.	OK
Violation of the MRDL for chlorine dioxide as defined in §141.65 and determined according to §141.133(c)(2)	§ 141.32(a)(1)(iii)(e)	NA	“	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
Owner/operator of CWS must give copy of the most recent public notice for any outstanding violation of any MCL, any MRDL, or any treatment technique requirement, or any variance or exemption to all new billing units or new hookups prior to or at the time service begins	§ 141.32(c)	NA	“	OK
Chlorine public notification language	§ 141.32(e)(76)	NA	“	OK
Chloramines public notification language	§ 141.32(e)(77)	NA	“	OK
Chlorine Dioxide public notification language	§ 141.32(e)(78)	NA	“	OK
Chlorine Dioxide Nonacute Violations public notification language	§141.32(e)(78)(i)	NA	“	OK
Chlorine Dioxide Acute Violations public notification language	§141.32(e)(78)(ii)	NA	“	OK
Disinfection Byproducts and Treatment Technique for DBPs public notification language	§ 141.32(e)(79)	NA	“	OK
Bromate public notification language	§ 141.32(e)(80)	NA	“	OK
Chlorite public notification language	§ 141.32(e)(81)	NA	“	OK
SUBPART F—MAXIMUM CONTAMINANT LEVEL GOALS AND MAXIMUM RESIDUAL DISINFECTANT LEVEL GOALS¹				
§ 141.53	MAXIMUM CONTAMINANT LEVEL GOALS FOR DISINFECTION BYPRODUCTS			

¹ States need not have corresponding MCLGs and MRDLs.

Bromodichloromethane: zero Bromoform: zero Bromate: zero Dichloroacetic acid: zero Trichloroacetic acid: 0.3 mg/L Chlorite: 0.8 mg/L Dibromochloromethane: 0.06 mg/L	§ 141.53	[Intentionally left blank.]	Nevada is not required to adopt MCLGs.	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
§ 141.54 MAXIMUM RESIDUAL DISINFECTANT LEVEL GOALS FOR DISINFECTANTS				
Chlorine: 4 mg/L (as Cl ₂) Chloramines: 4 mg/L (as Cl ₂) Chlorine dioxide: 0.8 mg/L (as ClO ₂)	§ 141.54	[Intentionally left blank.]	Nevada is not required to adopt MCLGs.	OK
SUBPART G—MAXIMUM CONTAMINANT LEVELS AND MAXIMUM RESIDUAL DISINFECTANT LEVELS				
§ 141.64 MAXIMUM CONTAMINANT LEVELS FOR DISINFECTION BYPRODUCTS				
Total trihalomethanes: 0.080 mg/L Haloacetic acids (five): 0.060 mg/L Bromate: 0.010 mg/L Chlorite: 1.0 mg/L	§ 141.64(a)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements	No	OK
Subpart H systems serving 10,000 or more people must comply with this section beginning <u>January 1, 2002</u> ; Subpart H systems serving fewer than 10,000 people and ground water systems must comply with this section beginning <u>January 1, 2004</u>	§ 141.64(b)(1)	"	No	OK
System installing GAC or membranes may apply to state for extension of up to 24 months past the compliance dates but not beyond December 31, 2003; state must set a schedule for compliance and may specify interim measures that the system must take; failure to meet the schedule or the interim requirements constitutes a violation of the NPDWRs	§ 141.64(b)(2)	"	No	OK
BATs for TTHMs, HAA5, Bromate, Chlorite	§ 141.64(c)	This portion of the regulation is no longer applicable after	No	OK - See comment.

		December 31, 2003, superseded by Stage 2 DBPR.		
§ 141.65 MAXIMUM RESIDUAL DISINFECTANT LEVELS				
Chlorine: 4.0 mg/L (as Cl ₂) Chloramines: 4.0 mg/L (as Cl ₂) Chlorine Dioxide: 0.8 mg/L (as ClO ₂)	§ 141.65(a)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	OK
CWSs and NTNCWSs: Subpart H systems serving 10,000 or more people must comply with this section beginning <u>January 1, 2002</u> ; Subpart H systems serving fewer than 10,000 people and ground water systems must comply with this section beginning <u>January 1, 2004</u>	§ 141.65(b)(1)	"	No	OK
TNCWSs: Subpart H systems using chlorine dioxide and serving 10,000 or more people must comply with the MRDL beginning January 1, 2002; Subpart H systems serving fewer than 10,000 people and using chlorine dioxide must comply with the chlorine dioxide MRDL beginning January 1, 2004	§ 141.65(b)(2)	"	No	OK
BATs for MRDLs	§ 141.65(c)	"	No	OK
SUBPART L—DISINFECTANT RESIDUALS, DISINFECTION BYPRODUCTS, AND DISINFECTION BYPRODUCT PRECURSORS				
§ 141.130 GENERAL REQUIREMENTS				
Requirements are NPDWR	§ 141.130(a)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary	No	OK

		standards: Requirements		
Regulations establish criteria under which CWSs and NTNCWSs which add a disinfectant to their water in any part of the treatment process must modify their practices to meet the MCLs and MRDLs in §141.64 and §141.65 and must meet treatment technique requirements for DBP precursors in §141.135	§ 141.130(a)(1)	"	No	OK
Regulations establish criteria under which transient NCWSs that use chlorine dioxide must modify their practices to meet the MRDL for chlorine dioxide in §141.65	§ 141.130(a)(2)	"	No	OK
EPA has established MCLs for TTHM and HAA5 and treatment technique requirements for DBP precursors	§ 141.130(a)(3)	"	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
CWSs and NTNCWSs: Subpart H systems serving 10,000 or more people must comply with this subpart beginning <u>January 1, 2002</u> ; Subpart H systems serving fewer than 10,000 persons and ground water systems must comply with this subpart beginning <u>January 1, 2004</u>	§ 141.130(b)(1)	"	No	OK
TNCWs Subpart H systems serving 10,000 or more people and using <u>chlorine dioxide</u> must comply with this subpart beginning <u>January 1, 2002</u> ; Subpart H systems serving fewer than 10,000 people and ground water systems using <u>chlorine dioxide</u> must comply with this subpart beginning <u>January 1, 2004</u>	§ 141.130(b)(2)	"	No	OK
CWSs and NTNCWSs must be operated by qualified personnel who meet the requirements specified by the state and are included in a state register of qualified operators	§ 141.130(c)	"	No	OK
Systems may increase residual disinfectant levels in the distribution system for chlorine or chloramines but not chlorine dioxide to a level and for a time necessary to protect public health to address specific microbiological contamination problems	§ 141.130(d)	"	No	OK
§ 141.131 ANALYTICAL REQUIREMENTS				

System must only use analytical method(s) specified in this section or approved by EPA to demonstrate compliance; methods are effective February 16, 1999	§ 141.131(a)(1)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements NAC 445A. 454- Primary standards: Monitoring and analysis.	No	OK
Documents containing analytical methods are incorporated by reference	§ 141.131(a)(2)	"	No	OK
Systems must measure DBPs by the methods listed in (b)(1)	§ 141.131(b)(1)	"	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
<u>Analysis for DBPs must be conducted by EPA or state-certified labs; labs must analyze PE samples annually for certification; lab must achieve a 95% confidence interval 80% of the time to remain certified</u>	§ 141.131(b)(2)	"	No	OK
<u>EPA or state approved party must measure daily chlorite samples at the entrance to the distribution system</u>	§ 141.131(b)(3)	"	No Additional detail is provided as follows: Each water system employee who conducts chlorite monitoring must perform an Initial Demonstration of Capability (JDC) and Continuing Demonstration of Capability (CDC). The documentation must be retained by the PWS and will be reviewed during each Sanitary Survey and annually by Bureau of Safe Drinking Water Laboratory Certification staff. Furthermore, a Standard Operating Procedure (SOP) for ensuring consistency amongst water system staff will be required from each affected water system. IDC/CDC templates and SOP example (Attachment A), or approved equivalent, are to be utilized	OK

			by PWS. State Primacy staff will verify that the SOP process is followed by Public Water System personnel during each routine Sanitary Survey. If any of the process is lacking, a significant deficiency will be noted and require the water system to update their monitoring process to comply.	
Systems must measure residual disinfectant concentrations for free chlorine, combined chlorine, and chlorine dioxide by the methods listed in (c)(1)	§ 141.131(c)(1)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements NAC 445A. 454- Primary standards: Monitoring and analysis. NAC 445A.458- Conduct of analysis.	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
System may also measure residual disinfectant concentrations using DPD colorimetric test kits if approved by the state	§ 141.131(c)(2)	"	No	OK
Party approved by EPA or the state must measure residual disinfectant concentrations	§ 141.131(c)(3)	"	No	OK
Systems required to analyze additional parameters must use the specified methods; party approved by the state or EPA must measure the parameters	§ 141.131(d)	"	No	OK
Methods for measuring alkalinity	§ 141.131(d)(1)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements NAC 445A. 454- Primary standards: Monitoring and	No	OK

		analysis.		
Methods for measuring bromide	§ 141.131(d)(2)	“	No	OK
Methods for measuring TOC	§ 141.131(d)(3)	“	No	OK
Methods for measuring SUVA	§ 141.131(d)(4)	“	No	OK
Methods for measuring DOC	§ 141.131(d)(4)(i)	“	No	OK
Methods for measuring UV254	§ 141.131(d)(4)(ii)	“	No	OK
Methods for measuring pH	§ 141.131(d)(5)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements NAC 445A. 454- Primary standards: Monitoring and analysis. NAC 445A.458- Conduct of analysis.	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
§ 141.132 MONITORING REQUIREMENTS				
Systems must take all samples during normal operating conditions	§ 141.132(a)(1)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements NAC 445A. 454- Primary standards: Monitoring and analysis.	No	OK

System may consider multiple wells drawing water from a single aquifer as one treatment plant for determining the minimum number of TTHM and HAA5 samples required in (h) with state approval	§ 141.132(a)(2)	"	No	OK
Failure to monitor in accordance with the monitoring plan is a monitoring violation	§ 141.132(a)(3)	"	No	OK
Failure to monitor will be treated as a violation for the entire period covered by an annual average where compliance is based on an annual average of monthly or quarterly samples or averages and a system's failure to monitor makes it impossible to determine MCL/MRDL compliance	§ 141.132(a)(4)	"	No	OK
Systems may use only data collected under the provisions of this subpart or Subpart M to qualify for reduced monitoring	§ 141.132(a)(5)	"	No	OK
Routine monitoring requirements for TTHM and HAA5	§ 141.132(b)(1)(i)	"	No	OK
Reduced monitoring requirements for TTHM and HAA5	§ 141.132(b)(1)(ii)	"	No	OK
System on a reduced monitoring schedule may remain on that schedule as long as annual average of all samples taken in the year or the result of the sample is no more than 0.060mg/L for TTHM and 0.045 mg/L for HAA5; systems that do not meet these levels must resume monitoring at the frequency identified in (b)(1)(i) in the quarter immediately following the monitoring period of the exceedance. For systems using only ground water not under the direct influence of surface water and serving fewer than 10,000 persons, if either the TTHM annual average is >0.080 mg/l or the HAA5 annual average is >0.060 mg/L, the system must go to increased monitoring at the frequency identified in (b)(1)(i) in the quarter immediately following the monitoring period of the exceedance.	§ 141.132(b)(1)(iii)	"	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
Systems on increased monitoring may return to routine monitoring if TTHM annual average is #0.060 mg/L and HAA5 annual average is #0.045 mg/L	§ 141.132(b)(1)(iv)	"	No	OK
State may return a system to routine monitoring at the state's discretion	§ 141.132(b)(1)(v)	"	No	OK
Routine daily monitoring requirements for chlorite	§ 141.132(b)(2)(i)(A)	"	No	OK

Routine monthly monitoring requirements for chlorite	§ 141.132(b)(2)(i)(B)	“	No	OK
Additional monitoring requirements for chlorite	§ 141.132(b)(2)(ii)	“	No	OK
No reduced daily monitoring for chlorite	§ 141.132(b)(2)(iii)(A)	“	No	OK
Reduced monitoring in distribution system for chlorite	§ 141.132(b)(2)(iii)(B)	“	No	OK
Routine monitoring requirements for bromate	§ 141.132(b)(3)(i)	“	No	OK
Reduced monitoring requirements for bromate	§ 141.132(b)(3)(ii)	“	No	OK
Routine monitoring requirements for chlorine and chloramines	§ 141.132(c)(1)(i)	“	No	OK
No reduced monitoring for chlorine and chloramines	§ 141.132(c)(1)(ii)	“	No	OK
Routine monitoring requirements for chlorine dioxide	§ 141.132(c)(2)(i)	“	No	OK
Additional monitoring requirements for chlorine dioxide	§ 141.132(c)(2)(ii)	“	No	OK
No reduced monitoring for chlorine dioxide	§ 141.132(c)(2)(iii)	“	No	OK
Routine monitoring requirements for DBP precursors	§ 141.132(d)(1)	“	No	OK
Reduced monitoring requirements for DBP precursors	§ 141.132(d)(2)	“	No	OK
Monitoring requirements for bromide, to remain on reduced bromate monitoring	§ 141.132(e)	“	No	OK
Each system required to monitor must develop and implement a monitoring plan; system must maintain the plan and make it available to the state and the general public no later than 30 days following applicable compliance dates; Subpart H systems serving more than 3,300 must submit a copy of the monitoring plan to the state no later than the date of the first report required under §141.134; state may require any system to submit its monitoring plan; state may require changes in any plan element	§ 141.132(f)	“	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
Monitoring plan: locations and schedules for collecting samples for any parameters	§ 141.132(f)(1)	“	No	OK
Monitoring plan: how system will calculate compliance with MCL, MRDLs, treatment techniques	§ 141.132(f)(2)	“	No	OK
Monitoring plan: sampling plan must reflect the entire distribution	§ 141.132(f)(3)	“	No	OK

system if approved for monitoring as a consecutive system or if providing water to a consecutive system				
§141.133 COMPLIANCE REQUIREMENTS				
System fails to monitor that makes it impossible to determine compliance with the MCLs or MRDLs will be treated as a violation for entire period covered by an annual average	§ 141.133(a)(1)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements NAC 445A. 454- Primary standards: Monitoring and analysis.	No	OK
All samples taken and analyzed under this subpart must be included in determining compliance even if the number is greater than the minimum required	§ 141.133(a)(2)	"	No	OK
If, during the first year of monitoring, any individual quarter's average will cause the annual average of that system to exceed the MCL the system is out of compliance at end of that quarter	§ 141.133(a)(3)	"	No	OK
Compliance requirements for TTHM and HAA5 MCLs for systems monitoring quarterly	§ 141.133(b)(1)(i)	"	No	OK
Compliance requirements for TTHM and HAA5 MCLs for systems monitoring less than quarterly; system must increase monitoring to once per quarter if MCL exceeded	§ 141.133(b)(1)(ii)	"	No	OK
Compliance requirements for TTHM and HAA5 MCLs, if running annual arithmetic average of quarterly averages covering any four- quarter period exceeds the MCL, the system is in violation of the MCL.	§ 141.133(b)(1)(iii)	"	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
Compliance requirements for TTHM and HAA5 MCLs, if a PWS fails to complete four consecutive quarters of monitoring, compliance with the MCL for the last four-quarters compliance period must be based on an average of the available data.	§ 141.133(b)(1)(iv)	"	No	OK

Compliance requirements for bromate	§ 141.133(b)(2)	“	No	OK
Compliance requirements for chlorite	§ 141.133(b)(3)	“	No	OK
Compliance requirements for chlorine and chloramines; if the MRDL is exceeded the system must notify the public and report to the state	§ 141.133(c)(1)(i)	“	No	OK
Compliance requirements for systems switching between the use of chlorine and chloramines	§ 141.133(c)(1)(ii)	“	No	OK
Compliance requirements for chlorine dioxide acute violations	§ 141.133(c)(2)(i)	“	No	OK
Compliance requirements for chlorine dioxide nonacute violations	§ 141.133(c)(2)(ii)	“	No	OK
Compliance requirements for DBP precursors	§ 141.133(d)	“	No	OK
§ 141.134 REPORTING AND RECORDKEEPING REQUIREMENTS				
Systems required to sample at least quarterly must report to the state within 10 days after the end of each quarter in which samples were collected; systems required to sample less frequently than quarterly must report to the state within 10 days after the end of each monitoring period in which samples were collected	§ 141.134(a)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements	No	OK
Reporting Requirements for DBPs	§ 141.134(b)	“	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
Reporting Requirements for TTHM and HAA5	§ 141.134(b)	“	No	OK

Reporting Requirements for Chlorite	§ 141.134(b)	"	No	OK
Reporting Requirements for Bromate	§ 141.134(b)	"	No	OK
Reporting Requirements for Disinfectants	§ 141.134(c)	"	No	OK
Reporting Requirements for Chlorine and Chloramines	§ 141.134(c)	"	No	OK
Reporting Requirements for Chlorine Dioxide	§ 141.134(c)	"	No	OK
Reporting Requirements for DBP precursors	§ 141.134(d)	"	No	OK
§ 141.135 TREATMENT TECHNIQUE FOR CONTROL OF DBP PRECURSORS				
Subpart H systems using conventional filtration (as defined in §141.2) must operate with enhanced coagulation or enhanced softening to achieve the TOC percent removal levels specified in (b) unless the system meets at least one of alternative compliance criteria in (a)(2) or (a)(3)	§ 141.135(a)(1)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements	No	OK
Subpart H systems using conventional filtration treatment may use alternative compliance criteria to comply with this section; systems must still comply with the monitoring requirements in §141.132(d)	§ 141.135(a)(2)	"	No	OK
Alternative compliance criterion: source water running annual average TOC < 2.0 mg/L	§ 141.135(a)(2)(i)	"	No	OK
Alternative compliance criterion: treated water running annual average TOC < 2.0 mg/L	§ 141.135(a)(2)(ii)	"	No	OK
Alternative compliance criterion: source water running annual average TOC < 4.0 mg/L; alkalinity > 60 mg/L; TTHM # 0.040 mg/L and HAA5 # 0.030 mg/L or system has made a clear and irrevocable financial commitment to use technologies that will limit the levels of TTHMs and HAA5s	§ 141.135(a)(2)(iii)	"	No	OK
Alternative compliance criterion: running annual average TTHM < 0.040 mg/L and annual average HAA5 < 0.030 mg/L; system uses only chlorine for primary disinfection and maintenance of a residual in the distribution system	§ 141.135(a)(2)(iv)	"	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE	

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Alternative compliance criterion: source water SUVA # 2.0 L/mg-m	§ 141.135(a)(2)(v)	“	No	OK
Alternative compliance criterion: finished water SUVA # 2.0 L/mg-m	§ 141.135(a)(2)(vi)	“	No	OK
Systems practicing enhanced softening that cannot achieve TOC removals in (b)(2) may use alternative compliance criteria; system must still comply with monitoring requirements in §141.132(d)	§ 141.135(a)(3)	“	No	OK
Alternative compliance criterion: softening that results in lowering treated water running annual average alkalinity to < 60 mg/L (as CaCO3)	§ 141.135(a)(3)(i)	“	No	OK
Alternative compliance criterion: softening that results in removing running annual average of at least 10 mg/L magnesium hardness (as CaCO3)	§ 141.135(a)(3)(ii)	“	No	OK
Systems must achieve the percent reductions of TOC specified in (b)(2) between the raw water source and CFE unless the state approves a system’s request for alternative minimum TOC (Step 2) requirements under (b)(3)	§ 141.135(b)(1)	“	No	OK
Required TOC (Step 1) reductions are based on specified source water parameters; systems that use enhanced softening must meet the percent removal requirements for alkalinity > 120 mg/L for specified source water TOC	§ 141.135(b)(2)	“	No	OK
Subpart H systems that cannot achieve the TOC removals in (b)(2) must apply to state within 3 months of failure to achieve the removals for the approval of alternative minimum TOC removal requirements	§ 141.135(b)(3)	“	No	OK
Applications to the state for alternative minimum TOC removals under (b)(3) must include the results of bench- or pilot-scale testing under (b)(4)(i) used to determine an alternate enhanced coagulation level	§ 141.135(b)(4)	“	No	OK
Definition of alternate enhanced coagulation level	§ 141.135(b)(4)(i)	“	No	OK
Requirements for bench- or pilot-scale testing	§ 141.135(b)(4)(ii)	“	No	OK

Requirements for waters with alkalinities < 60 mg/L for which small amounts of alum or equivalent addition of iron coagulant drive the pH below 5.5 before significant TOC removal occurs	§ 141.135(b)(4)(iii)	"	No	OK
FEDERAL REQUIREMENT	FEDERAL CITATION	STATE CITATION (DOCUMENT TITLE, PAGE NUMBER, SECTION/PARAGRAPH)	DIFFERENT FROM FED. REQUIREMENT? EXPLAIN ON SEPARATE SHEET	
System may operate at any coagulant dose of pH necessary (consistent with other NPDWRs) to achieve the minimum TOC percent removal approved in (b)(3)	§ 141.135(b)(4)(iv)	"	No	OK
System may apply to the state for a waiver of enhanced coagulation requirements if water is deemed non-amenable to enhanced coagulation (if the TOC removal is consistently less than 0.3 mg/L of TOC per 10mg/L of incremental alum dose at all dosages of alum, the water is deemed to contain TOC not amenable to enhanced coagulation)	§ 141.135(b)(4)(v)	"	No	OK
Systems must calculate compliance quarterly beginning after the system has collected 12 months of data	§ 141.135(c)(1)	"	No	OK
Determine actual monthly TOC percent removal	§ 141.135(c)(1)(i)	"	No	OK
Determine required monthly TOC percent removal from (b)(2) or (b)(3)	§ 141.135(c)(1)(ii)	"	No	OK
Divide value from (c)(1)(i) by value from (c)(1)(ii)	§ 141.135(c)(1)(iii)	"	No	OK
Add results for (c)(1)(iii) for last 12 months and divide by 12	§ 141.135(c)(1)(iv)	"	No	OK
If value from (c)(1)(iv) < 1.00 the system is not in compliance with the TOC percent removal requirements	§ 141.135(c)(1)(v)	"	No	OK
Systems may use provisions in (c)(2)(i) through (v) in lieu of the calculations in (c)(1)(i) through (v) to determine compliance with TOC percent removal requirements	§ 141.135(c)(2)	"	No	OK
If in any month treated or source water TOC < 2.0 mg/L the system may assign a monthly value of 1.0	§ 141.135(c)(2)(i)	"	No	OK
In any month the system practicing softening removed at least 10 mg/L of magnesium hardness (as CaCO ₃) the system may assign a monthly value of 1.0	§ 141.135(c)(2)(ii)	"	No	OK

In any month source water SUVA prior to treatment # 2.0 L/mg-m the system may assign a monthly value of 1.0	§ 141.135(c)(2)(iii)	“	No	OK
In any month finished water SUVA prior to treatment # 2.0 L/mg-m the system may assign a monthly value of 1.0	§ 141.135(c)(2)(iv)	“	No	OK
In any month a system practicing enhanced softening lowers alkalinity below 60 mg/L (as CaCO ₃) the system may assign a monthly value of 1.0	§ 141.135(c)(2)(v)	“	No	OK
Subpart H systems using conventional treatment may also comply with the requirements of this section by meeting the criteria in (a)(2) or (3)	§ 141.135(c)(3)	“	No	OK
Agency identifies treatment techniques for DBP precursors: enhanced coagulation or enhanced softening	§ 141.135(d)	“	No	OK

SUBPART O—CONSUMER CONFIDENCE REPORTS

NOTE: If the CCR rule has not been adopted, is it not expected that the Subpart O provision will be adopted with the IESWTR

§ 141.154 REQUIRED ADDITIONAL HEALTH INFORMATION

CWSs that detect TTHM above 0.080 mg/L but below the MCL in §141.12 as an annual average monitored and calculated under §141.30 must include health effects language prescribed by paragraph (73) of Appendix C to Subpart O	§ 141.154(e)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements NAC 445A.4845- Consumer Confidence Reports.	No	OK
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PRIVACY REVISION CROSSWALK FOR THE STAGE 1 DBPR

Federal Requirement	Federal Citation	State Citation	Explanation of State Policies and Procedures	EPA Review - Discussion
SUBPART B—PRIMARY ENFORCEMENT RESPONSIBILITY				
§ 142.14 RECORDS KEPT BY STATES				
Records of currently applicable or most recent state determinations; explanation of technical basis for each decision; interim measures toward installation	§ 142.14(d)(12)	NRS 239.073 to 239.125, inclusive	Nevada Revised Statute 239.080, inclusive, provides for records retention and disposition schedules, toward installation which dictates the instrument used to determine records retention and disposition schedules, "NRS 239.080 and Nevada BSDW Records Retention Schedules" (Attachment B). Nevada's PWS records retention policies are no less stringent than those set by 40 CFR 142.14(d)(12) RDA #2003107 approved by Committee to Approve Retention and Disposition of Official State Records specifies that records must be retained for 40 years after the system is inactivated.	The state requirement is as stringent as the federal regulation.
States must keep records of systems installing GAC or membrane technology; date by which system is required to have completed installation	§ 142.14(d)(12)(i)	NRS 239.073 to 239.125, inclusive	Nevada Revised Statute 239.080 provides for records retention and disposition schedules. RDA #2003107 approved by Committee to Approve Retention and Disposition of Official State Records specifies that records must be retained for 40 years after the system is inactivated.	The state requirement is as stringent as the federal regulation.
State must keep records of systems that are required to meet alternative minimum TOC removal requirements or for whom state has determined that source water is not amenable to enhanced coagulation; alternative limits and rationale for establishing alternative limits	§ 142.14(d)(12)(ii)	NRS 239.073 to 239.125, inclusive	"	The state requirement is as stringent as the federal regulation.
States must keep records of Subpart H systems using conventional treatment meeting any of the alternative compliance criteria in §141.135(a)(2) or (3)	§ 142.14(d)(12)(iii)	NRS 239.073 to 239.125, inclusive	"	The state requirement is as stringent as the federal regulation.
States must keep a register of qualified operators that have met state	§ 142.14(d)(12)(iv)	NRS 239.073 to 239.125, inclusive	NRS 239.080 provides for records retention and dispositions schedules. RDA#2003115	The state requirement is as stringent as the federal regulation.

requirements under §141.16(f)(2)			approved by the Committee to Approve Retention and Disposition of Official State Records specifies that records be retained for 12 calendar years. This information will be maintained in the SDWIS database.	
Records of systems with multiple wells considered to be 1 treatment plant in accordance with 141.132(a)(2) and 142.16(h)(5).	§ 142.14(d)(13)	NRS 239.073 to 239.125, inclusive	Nevada Revised Statute 239.080 provides for records retention and disposition schedules. RDA #2003107 approved by Committee to Approve Retention and Disposition of Official State Records specifies that records must be retained for 40 years after the system is inactivated.	The state requirement is as stringent as the federal regulation.
Monitoring plans for Subpart H systems serving more than 3,300 people in accordance with 141.132(f).	§ 142.14(d)(14)	NRS 239.073 to 239.125, inclusive	“	The state requirement is as stringent as the federal regulation.
List of laboratories approved for analyses	§ 142.14(d)(15)	NRS 239.073 to 239.125, inclusive	NRS 239.080 provides for records retention and dispositions schedules. RDA #2005063 approved by Committee to Approve Retention and Disposition of Official State Records specifies that documents pertaining to laboratory certification be retained for a period of 12 years from the date of the expiration, revocation or suspension of the certification. An annual list of labs approved to analyze will be maintained (Attachment B).	The state requirement is as stringent as the federal regulation.
List of systems required to monitor for disinfectants and DBPs; indicate what disinfectants and DBPs (other than chlorine, TTHM, and HAA5) are measured	§ 142.14(d)(16)	NRS 239.073 to 239.125, inclusive	NRS 239.080 provides for records retention and dispositions schedules. RDA #2013005 approved by Committee to Approve Retention and Disposition of Official State Records specifies that records be retained for 50 calendar years after record received. An annual list of PWS required to monitor will be maintained (Attachment B).	The state requirement is as stringent as the federal regulation.
§ 142.16 SPECIAL PRIMACY REQUIREMENTS				
Requirements for states to adopt 40 CFR part 141, Subpart L (state regs must be at least as stringent)	§ 142.16(h)	NRS 445A.855, 445A.855.860 and 445A.863 NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it	NRS 445A.855 is the authority under which NAC 445A.4525 adopts 40 CFR 141.130 to 141.135, inclusive. NAC 445A.453 requires all PWS to meet the requirements for the National Primary Drinking Water Regulations and related federal regulations as adopted by reference. Adoption by reference includes Subpart L (141.130 - 141.135 in its entirety with no reservations therefore the state regulation is as stringent as the federal regulation.	The state requirement is as stringent as the federal regulation.

		existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements.		
Application must contain description of how state will accomplish program requirements	§ 142.16(h)	[Intentionally left blank.]	[Intentionally left blank.]	[Intentionally left blank.]
Program requirement: determine any interim treatment requirements for systems electing to install GAC or membranes and are granted additional time to comply with §141.64 (state does not have to respond if it utilizes authority under §1412(b)(10) to extend schedule) § 1412(b)(10) to extend schedule)	§ 142.16(h)(1)	NRS 445A.855	This portion of the regulation is no longer applicable. No extensions were necessary or granted in Nevada. However, had they been necessary, the extensions of time for compliance would have been issued as a bi-lateral compliance agreement.	This portion of the regulation is no longer applicable after December 31, 2003, superseded by Stage 2 DBPR.
Program requirement: qualify operators of PWSs	§ 142.16(h)(2)	NRS 445A.870-445A.880, inclusive; NAC445A.617-445A.652, inclusive	NRS 445A.870-445A.880, inclusive, provides the Division of Environmental Protection with the authority to develop regulations for operator inclusive certification; NAC 445A.617-445A.652, inclusive, includes the regulations adopted by the State Environmental Commission for this purpose.	40 C.F.R. § 142.16(h)(2) requires that the application demonstrates how NDEP qualifies operators of PWSs subject to the DBPR (40 C.F.R. Part 141 subpart L). NDEP's operator certification rules (NAC 445A.617-445A.652) adequately describe the qualification requirements established for operators of systems that meet subpart L requirements under 40 C.F.R. § 141.130(c) requiring regulated PWSs to be operated by qualified personnel who meet the requirements specified by the State. Therefore, NDEP has an approved operator certification program that meets EPA's national guidelines for the certification of operators and this element has been met by the application.
Program requirement: approve DPD colorimetric test kits for free and total chlorine measurements	§ 142.16(h)(3)	NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by reference federal regulation as it existed on July 1,	Each water system employee who conducts free or total chlorine residual compliance monitoring must perform an Initial Demonstration of Capability (IDC). The documentation must be retained by the PWS and will be reviewed during each Sanitary Survey. Furthermore, a Standard Operating Procedure (SOP) for ensuring consistency amongst water system staff will be required from each affected water system. IDC and SOP templates (Attachment C), or	The rule gives states the option under 141.131(c)(2) to decide if its use is approved. This special primacy condition asks states to specify the conditions for allowance. The SOP and template provided in Attachment C sufficiently meet this requirement.

		<p>2014. NAC 445A.453- Primary standards: Requirements. NAC 445A. 454- Primary standards: Monitoring and analysis. NAC 445A.458- Conduct of analysis.</p>	<p>approved equivalent, are to be utilized by PWS. State Primacy staff will verify that the SOP process is followed by Public Water System personnel during each routine Sanitary Survey. If any of the process is lacking, a significant deficiency will be noted and require the water system to update their monitoring process to comply.</p>	
<p>Program requirement: approve parties to conduct pH, bromide, alkalinity, and residual disinfectant concentration measurements</p>	<p>§ 142.16(h)(4)</p>	<p>NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopted by reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements. NAC 445A. 454- Primary standards: Monitoring and analysis. NAC 445A.458- Conduct of analysis. NAC 445A.617-445A.652, inclusive</p>	<p><u>Bromide and Alkalinity</u>-NAC 445A.458 required these analyses to be performed by a laboratory certified pursuant to the "Certification of Laboratories to Analyze Drinking Water" regulations, NAC 445A.542 through 445A.54296.</p> <p><u>All measurements allowed by NAC 445A.458 would be conducted by</u> water system personnel.</p> <p><u>pH</u>-NAC 445A.458 requires pH measurements be made by the public water system personnel utilizing an instrument and methods capable of meeting the requirements of 40 C.F.R. § 141.23(k)(1), as adopted by reference in NAC 445A.4525. See procedure (Attachment D)</p> <p><u>Monitoring and Residual Disinfectant Concentration Measurements</u>- NAC 445A.458 requires chlorine, chloramine or chlorine dioxide measurements to be made by public water system personnel using an instrument and method capable of meeting the requirements of 40 C.F.R. § 141.131 (c) as adopted by reference in NAC 445A.4525.</p> <p>Chlorine- See section above for approval process to measure for Free Chlorine Residual.</p> <p>Chloramine- Use Chlorine approval process to measure for Total Chlorine Residual. Chlorine Dioxide: Similar process to chlorine will be followed, but SOP will be specific to the water system and their equipment. The capability review will also be more rigorous with oversight from Laboratory Certification Branch. The EPA approved method and the equipment used will be required as part of Certification oversight.</p>	<p><u>40 C.F.R. § 142.16(h)(4) requires that the application demonstrates how NDEP approves parties to conduct water quality measurements for pH, bromide, alkalinity, and residual disinfectant concentrations. NDEP requires PWSs to be operated by individuals that are certified at the appropriate grade and class for the facility (NAC 445A.542 through 445A.54296). This is sufficiently described in the application.</u></p>

			<p>Additional detail is provided as follows: Each water system employee who conducts chlorine dioxide monitoring must perform an Initial Demonstration of Capability (IDC) and Continuing Demonstration of Capability (CDC). The documentation must be retained by the PWS and will be reviewed during each Sanitary Survey and annually by Bureau of Safe Drinking Water Laboratory Certification staff.</p> <p>Furthermore, a Standard Operating Procedure (SOP) for ensuring consistency amongst water system staff will be required from each affected water system.</p> <p>IDC/CDC templates and SOP example (Attachment XX), or approved equivalent, are to be utilized by PWS.</p> <p>State Primacy staff will verify that the SOP process is followed by Public Water System personnel during each routine Sanitary Survey. If any of the process is lacking, a significant deficiency will be noted and require the water system to update their monitoring process to comply.</p>	
Program requirement: define criteria to use to determine if multiple wells are being drawn from a single aquifer and may be considered a single source for compliance with monitoring requirements.	§ 142.16(h)(5)	“	<p>This portion of the regulation is no longer applicable after December 31, 2003, superseded by Stage 2 DBPR.</p>	<p>40 C.F.R. § 142.16(h)(5) requires that the application demonstrates that NDEP has defined the criteria that will be used for allowing representative single source sampling for compliance with monitoring requirements for systems that have multiple wells drawing from a single aquifer under 40 C.F.R. §141.132(a)(2) when determining the number of TTHM and HAA5 samples required. 40 C.F.R. §141.132(a)(2) provided for representative sampling using a treatment plant approach. This approach is no longer applicable and has been superseded by 40 C.F.R. part 141, subpart V, whereby the monitoring frequency of TTHM and HAA5 samples, as set forth in 40 C.F.R. § 141.621, is no longer treatment plant based. Since this demonstration is no longer necessary, it is not needed in the application.</p>
Program requirement: approve alternative TOC (Step 2) removal levels allowed under §141.135(b)	§ 142.16(h)(6)		<p>Alternative TOC removal provisions 141.135 (b)(4) were adopted by reference. NAC 445A.4525- Adoption by reference of certain provisions of "National Primary Drinking Water Regulations." Adopt by</p>	

			<p>reference federal regulation as it existed on July 1, 2014. NAC 445A.453- Primary standards: Requirements</p> <p>While 40 CFR § 141.135 allows for alternative compliance criteria for TOC, per the state's application, it is not currently approving alternative TOC removal requirements.</p> <p>However, if an application were received, NDEP would follow EPA guidance and instruct the PWS to perform a jar testing study according to the EPA "Enhanced Coagulation and Enhanced Precipitative Softening Guidance Manual" to prove the PWS' s inability to meet those requirements and show what ratio it can reliably meet. This study will be reviewed by the state drinking water engineering program for completeness and accuracy.</p> <p>Once the study has been reviewed, the State will issue a letter of acceptance that explains the new step 2 (alternative) removal requirements. The PWS will be required to meet this approved removal ratio to maintain compliance. Records of this decision will be provided to the system and saved in the system facility file following the record retention schedules as set out in 40 CFR 142.14.</p>	
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