Aqua Talk

A newsletter from the Safe Drinking Water Program

Colorado Department of Public Health and Environment

Protecting Source Water

Volume 8, Issue 2
Spring 2014

by John Duggan, Local Assistance Unit

Source water protection planning is active and ongoing in Colorado. Many public drinking water providers in the state are recognizing the benefits of proactive drinking water protection planning. Systems of varying size, ranging from the Denver Water Board to the Town of Alma, are taking the initiative to further understand the relationships between potential contaminant sources and sources of drinking water. Potential contaminants include: on-site waste water systems, pesticides, nitrates, agriculture and grazing impacts, and oil and gas operations. To maintain drinking water quality in Colorado, we could learn valuable lessons from public water systems that have experienced raw water quality issues. West Virginia American Water had an unfortunate experience with a chemical spill of methylcyclohexene methanol,

Jones Pass in the Ptarmagin Wilderness by Aaron Ciuffo

(Continued on page 3)

Message from the Safe Drinking Water Program Manager

Gathering Stakeholder Input for Regulations, Policies and Guidance

by Ron Falco, Safe Drinking Water Program Manager

We are developing the Revised Total Coliform Rule with fabulous input from stakeholders across the state. We really appreciate the time stakeholders put into attending meetings and providing written comments. You are the experts in running public drinking water systems; we strongly value your input to help us make the regulations effective and workable.

Through this regulatory process we will identify needed implementation policies and guidance documents. Implementation policies define how the department interprets laws and regulations or determines the appropriate approach to exercising flexibility while making case-specific decisions. Guidance documents provide non-binding recommended practices to assist regulated entities with compliance. We will continue to solicit your help and support in developing these important components of the overall implementation framework. In some cases, the work on documents will begin before the RTCR rulemaking. These documents need to be complete well in advance of regulatory effective dates.

As you participate in these processes with us please think beyond your water system or even type of water system. The regulations need to be effective and workable across a wide range of system types and levels of expertise within those systems. We do not want to make regulations, policies or guidance difficult for any system to understand and comply. We recognize that most public drinking water systems always do the right thing anyway. However, we still need a robust implementation framework that aligns with public expectations and helps us work with systems that may not always understand the correct course of action.

We value our partnership with you to ensure safe drinking water in Colorado! We know safe drinking water doesn't happen by chance, you make it happen every day.

Thank you.

Protecting Source Water

(Continued from page 1)

associated with a coal washing process, which contaminated their source water, the Elk River. Could this source water impact been averted with the appropriate protection planning effort? Perhaps?

The best measure of an effective source water protection plan is to never have a raw source water quality issue. Source water protection is a community responsibility and needs to be implemented by public water systems, local and county governments, state and federal agencies, upstream potential contaminant facilities and the general public. Many of the activities, businesses and associated land uses within a local watershed area have the potential to contribute to the overall untreated source water quality in a region. Source water protection planning is a diverse public stakeholder participation effort that identifies the drinking water sources, the potential contaminant sources, prioritizes the contaminant sources and adopts a strategy to minimize potential impacts through best management practice implementation.

Source water protection planning is a process that *AIMs* for drinking water protection by creating **A**wareness, **I**nformation sharing, and a long term **M**anagement structure. A notable collaborative source water protection effort was recently completed in the Arkansas Valley with five public water providers: City of Canon City Water, City of Florence, Parkville Water District, Town of Poncha Springs, and Town of Buena Vista. A unique aspect of this project was the significant stakeholder and county-level participation, county adoption of the protection plans and a longer term commitment to protection planning. The county commissioners of Fremont and Lake counties entered into a memorandum of understanding recognizing the importance and collaboration necessary to protect the public drinking water supply into the future. This is a remarkable step forward for source water protection in Colorado.

The Water Quality Control Division has a unique and well developed source water protection planning program with grant funding opportunities available. Colorado Rural Water Association and their professional staff collaborate with the division to facilitate and implement source water protection planning throughout Colorado. Over 200 public water systems and communities have leveraged these technical and financial resources to effectively conduct source water protection planning. For more information on getting started with source water protection planning visit the Colorado Rural Water Association website at www.crwa.net under the source water protection link. ♦

Safe Drinking Water Program Now Offers Excellence Awards!

by David Dani, Capacity Building Unit

Is your system going beyond meeting regulatory requirements to provide safe and reliable drinking water from source to tap? Get recognized and rewarded for your performance.

Award perks:

1. Award certificate presented to system at award ceremony
2. Free training opportunities for staff
3. Public recognition in industry publications
4. Letter for system administrator
5. Language to share with customers

Complete these steps to pursue an award for drinking water excellence in 2014:

1. Set goals
2. Improve performance
3. Meet excellence criteria

Red Rocks Community College training facility.

Go to www.colorado.gov/cdphe/dw and click on safe drinking water program excellence awards for further details. ♦

by Ron Falco, Safe Drinking Water Program Manager

National Drinking Water Week was May 4-10, 2014. We obtained a proclamation from the governor recognizing the importance of safe drinking water. Other activities included a press release, issuing our annual report on the program and developing flood-related articles with the Colorado Foundation for Water Education. Please let us know what activities you did during drinking water week. Over the coming years, we would like to energize a widespread celebration of national drinking water week, so look for more outreach in the future. ♦

State Revolving Fund Update

by Mike Beck, Grants and Loans Unit

On Jan. 17, 2014, H.R. 3547 the Consolidated Appropriations Act 2014 was enacted. This law will provide $906 million to the national drinking water state revolving funds for federal fiscal year 2014. The fiscal year 2013 allocation to the fund was $831 million, which represents a 5.2 percent increase for fiscal year 2014. The increase was a nice surprise from earlier speculations of decreased funding. The fund increase comes with a buy American requirement for iron and steel products used in all fund projects for the construction, alteration, maintenance or repair of a public water system or treatment works.

The buy American requirement will apply to all construction activities financed through Colorado's revolving fund program. However, this requirement will only be applicable to projects that execute an assistance agreement on or after Jan.17 and prior to Oct. 1, 2014, and possibly later. Projects with approved plans and specifications and/or an executed loan application prior to Jan. 17 are exempt. Grants and Loans Unit staff have notified projects affected by the new buy American requirement and have received positive feedback for implementation. ♦

Increased Readability Rulemaking is Now Effective

by Julie Kreyche, Compliance Assurance Section

The Water Quality Control Division completed a rulemaking to revise the Colorado Primary Drinking Water Regulations in December 2013. The revised regulation became effective March 1, 2014.

The objective of the revisions was to reorganize, simplify and clarify the existing CPDWR. These revisions are not substantive in nature and did not change any current implementation practices or requirements.

The division maintained the current structure of the CPDWR which is organized by drinking water rule. However, within each article, the regulation has been reorganized by the lifecycle of the rule (initial, routine, reduced, increased, etc.). This new structure is consistent throughout the regulation so readers can navigate the requirements with greater ease. As part of the revisions, the CPDWR also received a regulation number and numbering scheme that are consistent with other Water Quality Control Commission regulations; the CPDWR is now Regulation 11.

The final, approved version of the rewritten CPDWR is available on the commission's website at www.colorado.gov/cdphe/wqcc . ♦

Spring Run-off Impact on Turbidity

by Tyson Ingels, Engineering Section

There are several hundred surface water treatment plants in Colorado. Every spring as snow melts, rivers and streams experience not only an increase in turbidity but a corresponding increase in natural organic matter. Water quality typically becomes challenging to treat for a period of time. In addition, both the timing and duration of challenging water quality can vary significantly from year to year depending on snow pack, temperature and precipitation during the spring, as well as other factors. Increased occurrence of beetle kill and wildfires further complicate the water quality challenges faced by surface water treatment plants. To prepare, water systems have taken a variety of approaches. Typically, developing alternative water supplies for a given water treatment plant has been the most effective approach. If a water system can avoid having to take in water of lesser quality, the system can avoid installing costly treatment or possibly experience other unwanted side effects. However, many times alternative sources of water are not available or practical. In such cases, water systems are increasingly turning to advanced treatment to deal with the increasing regulatory burden and water quality concerns. Technologies used to combat challenging water quality include operational techniques such as enhanced coagulation and pH control. Also, many utilities are exploring the use of advanced oxidation processes utilizing chlorine dioxide, ozone, ultraviolet light and hydrogen peroxide. In addition, adsorption utilizing activated carbon is widely employed to improve water quality. The Water Quality Control Division recognizes that water quality challenges will continue to grow as the regulatory climate changes and changing climate conditions continue to stress our existing water supplies. Utilities should consider this trend in their long-term planning efforts to ensure high-quality water to their consumers.

St. Vrain River near Frederick, CO

Consumer Confidence Report Reminder

By Nicole Graziano, Compliance Assurance Section

It's that time of year, consumer confidence reports are due July 1, 2014.

All community water systems are required to annually provide customers with a consumer confidence report. The goal of the report is to educate customers about what is in their drinking water, how the water is treated and where the water comes from. Additionally, the report identifies any contaminants detected in the drinking water and any violations received in the calendar year. By July 1 water systems must 1) deliver the report to customers and 2) submit a copy of the report, along with a certification of delivery form, to the Water Quality Control Division. The division develops draft reports for all systems. Draft reports are posted to www.wqcdcompliance.com/ccr in March. Please note the division allows electronic data submittal of these reports, as long as it meets the direct delivery requirements. Please contact Nicole Graziano at 303-692-3258 or nicole.graziano@state.co.us for specifics.

Simple fixes: Implement source water protection plans

by Paul Kosik, Engineering Section and John Duggan, Local Assistance Unit

The devastation and impact of the September 2013 floods in Colorado were unprecedented and arguably one of the worst natural disasters to affect Colorado streams, drinking water and wastewater infrastructure. Many areas received rainfall exceeding a 100-year flood event and some areas had exceeded 500 or even 1000-year flood events. Drinking water source contamination, structural damage and service interruptions affected public drinking water systems both large and small, groundwater or surface water. Inherently, unpredictable events can indiscriminately affect any water system.

Groundwater systems should consider source location related to floodplains when adding new sources or moving existing sources. Water systems should verify if the sources are out of the 100-year flood plain by referencing Federal Emergency Management Agency floodplain maps, which are free to the public. Altered topography and redirection of river and stream courses as a result of a flood aftermath may put a system's existing sources within a new floodplain. While wells may not always be located out of a floodplain, they should be designed so the casing extends above the level of the floodplain. If not, the system should be prepared to temporarily stop using the well when submerged, be able to use alternative sources and develop shock chlorination procedures to return the well online.

Surface water intake structure design and maintenance should provide safe access and prevent accumulation of silt, sand and debris. During events such as floods or fires, surface water sources may experience spikes in turbidity, *E. coli*, metals and total dissolved solids that can affect source water and plant operations. Surface water systems should consider storage capacity, redundancy, backup power generators, avoidance of contaminated source water, and/or presedimentation ponds (if applicable) to buffer against such events.

To effectively learn from the September 2013 disaster, water systems should review and improve emergency response procedures and better understand upstream source water contaminant sources. In addition, a complete understanding of the vulnerabilities of ground water and surface water sources during flooding events is strongly encouraged.

Drinking Water Quiz

Think you know everything about drinking water? Prove your drinking water knowledge with our quiz. Complete all four 2014 drinking water quizzes online and you'll be entered in a drawing to receive *AWWA Water Operator Field Guide*, valued over $50. The drawing will be held in January 2015. Go to *https://docs.google.com/forms/d/1pDexXhnGyHl3OPE8QCLe8dIXd35M1c5N1jTCrAD9cWc/viewform?usp=send_form* to record your answers. Answers will appear in the next issue. The winter 2014 quiz answers are on page 12.

1. What's the name of the new federal requirement for state revolving fund projects?

2. Select the three steps that a system must complete to pursue drinking water excellence award for 2014.
   A. Be nominated
   B. Set goals
   C. Pay a fee
   D. Improve performance
   E. Meet excellence criteria

3. What topics will the Local Assistance Unit's basic operator training include?
   A. disinfection
   B. basic math
   C. operation and maintenance (O&M)
   D. source water protection
   E. standard operating procedures
   F. monitoring and reporting
   G. sampling procedures
   H. cross connection
   I. emergency planning
   J. asset management
   K. sanitary survey preparation
   L. regulations
   M. all of the above

4. Does the division allow electronic submittal for consumer confidence reports?

5. What is the deadline for community water systems to deliver consumer confidence reports to their customers?

6. Which advanced oxidation processes are typically used in Colorado?
   A. Advanced oxidation processes utilizing chlorine dioxide
   B. Ozone
   C. Ultraviolet light and hydrogen peroxide
   D. All of the above

7. When was policy 4 published?

8. Did the recent Colorado Primary Drinking Water Regulation update include changes in how the regulations are implemented?

Baffling Factor Guidance Manual

by Doug Camrud, Engineering Section

As reported previously, the Water Quality Control Division contracted with Colorado State University, Department of Civil and Environmental Engineering, to develop a small system baffling factor guidance document. The guidance document has been finalized and addresses overall contact basin baffling factor issues for small systems. The document can be downloaded from the division's website by selecting *services> facility design and approval>* *drinking water facility approval*. The guidance also provides disinfection contact basin design guidance and the expected contact basin baffling factor through a range of operational flow rates. The guidance presents several pre-engineered small scale tanks and pipe configurations that can be used as an individual disinfection component or in combination. The pre-engineered tanks and pipe configurations, along with modifications that can be made to improve a baffling factor, went through extensive research and testing by CSU. The guidance provides information on basin geometry, inlet and outlet design (e.g., location and size), intra-basin baffling and modifications that can improve new or an existing contact basin design (e.g., adding packing materials or an inlet manifold). The work presented in the guidance document was initiated with the intention that small drinking water systems will be able to utilize the results presented in this guidance document by either installing one of the pre-engineered small-scale tanks and/or implementing the recommended modifications to existing infrastructure in order to comply with treatment requirements. The following table summarizes the pre-engineered systems and modifications presented in the guidance document. ♦

Sixteen inlet manifold

Open surface concrete tank

System/Modification Type	Range of Baffling Factor	Flow Rates (GPM)
Pipelines and Pipe Segments	0.6-1.0	≥ 5
Pressurized Retention Tanks	0.1-0.5	5-30
Open Surface Concrete Tanks	0.1-0.5	≥20
Non-pressurized Plastic Tanks	0.1-0.2	<50
Inlet Manifold*	0.1-0.5	<50
Packing Material*	0.1-0.6	<50

*Modification that can be used to increase the baffling factor of a disinfection tank.

New Training for 2014

by Mike Bacon, Drinking Water Coach

Gather around team! It's time for spring training! The Local Assistance Unit provides free trainings through the Coaching for Training Units Program. Training opportunities are located at www.colorado.gov/cdphe/dwtraining.com. Click on a month that suits your schedule. While visiting the website, check out the Drinking Water Excellence Program.

Training units are awarded for completed courses provided by the coaches:

- Developing a monitoring plan
- Sanitary survey training
- Groundwater under the direct influence of surface water training
- Operation and maintenance manual preparation

General coaching is available for financial assistance, asset management, plant optimization, tracer studies and more.

The Local Assistance Unit is developing *Basic Operator Training, a* two-day training package. This training is intended for small groundwater and surface water systems. The training will be offered at many locations, including the far corners of Colorado, allowing everyone a chance to participate. Yes, we will come to a neighboring water plant and provide training units.

Topics covered include: disinfection, basic math, operation and maintenance, source water protection, standard operating procedures, monitoring and reporting, sampling procedures, cross connection, emergency planning, asset management and sanitary survey preparation. Regulations will be discussed as applicable to the topic. Group exercises and class participation are a part of this training. If you have any questions or would like to host this training at your plant, please contact us.

If you need coaching assistance or need training units, please contact Jacki Main at 303-692-3665. Our training staff is willing to meet at your facility. ♦

Coach's Corner

Drawn by Tiffany Jackson

Operators doing a hands-on exercise at a Local Assistance Unit training session.

Policy 4 Guidance

by Tyson Ingels, Engineering Section

In October 2010, surface water treatment rule - performance assessment, proper operation and fostering improved operations, commonly known as Policy 4, was published after a lengthy stakeholder process. The purpose of the policy is to define and highlight the criteria the Water Quality Control Division, Safe Drinking Water Program uses to evaluate whether public water systems treating surface water are meeting regulatory requirements for removal/inactivation of *Giardia lamblia, Cyrptosporidium* and viruses. This policy defines the treatment technique removal credits for compliance filtration based on specific treatment type. In addition, the policy specifically refers to the regulatory term *proper operations*. The policy refers to a guidance document that further explains the expectations around the term *properly operated*. In January, the division finalized the guidance manual and published the manual on our web page. The manual further explains the concept of proper operations of surface water treatment plants as they are evaluated during sanitary surveys. In the manual, the concepts of proper operation are broken down into five key areas: acceptable treatment , purpose of treatment, appropriate monitoring, achieving removal/inactivation of pathogens, appropriate redundancy and properly operated individual units. These five key areas of proper operation of surface water treatment plans are shown in figure 1. The guidance document provides examples of significant deficiencies in each category and what water systems have done to resolve the deficiencies. The guidance manual is available on the division's web page: http://www.colorado.gov/cdphe/wqcd.

All surface water treatment and groundwater under the direct influence of surface water treatment facility operators should become familiar with the guidance manual. The division will assess whether the water systems are operating at the appropriate level during future sanitary surveys and this guidance document thoroughly demonstrates the expectations for proper operations. ♦

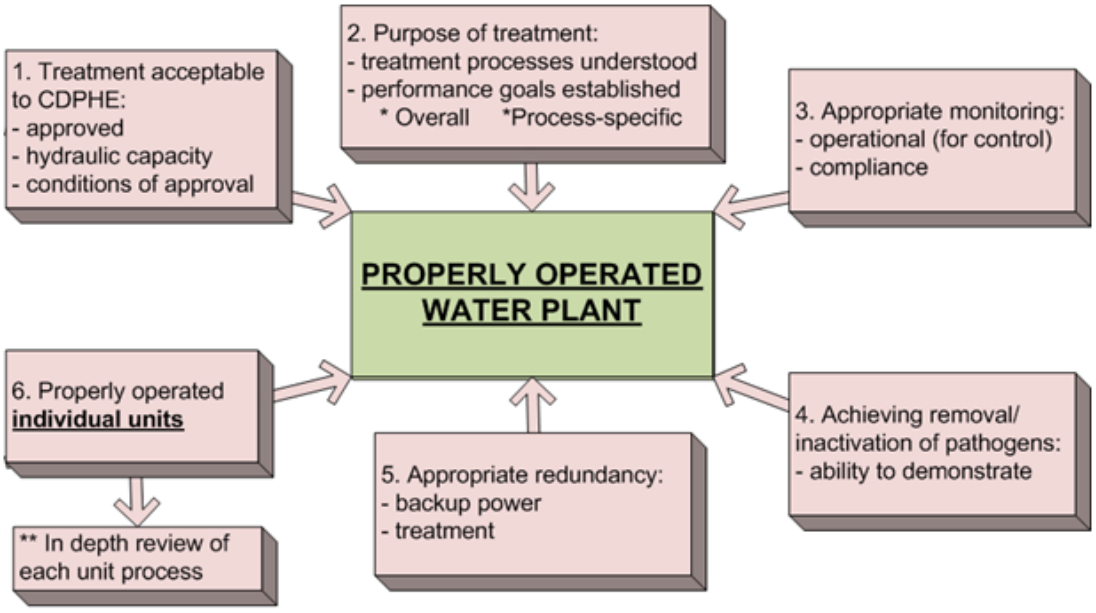

Figure 1: Overview of Focus Areas of a Properly Operated Surface Water Treatment Plant

Ask Aqua Man

Dear Aqua Man: I failed to monitor TTHM and HAA5 in the designated month on my monitoring schedule. Am I in violation?

Monty Phaller

Dear Monty:

Under the Stage 2 Disinfection By-Products Rule, which has been fully implemented in Colorado since Oct. 1, 2013, water systems must sample TTHM and HAA5 in the month of highest disinfection byproduct (DBP) formation, designated on their monitoring schedule. Water systems on quarterly monitoring must also sample at least every third calendar month to be in compliance. For example, if a sample is collected March 1, the next sample must be collected no later than June 30. A quarterly system's monitoring schedule displays the peak DBP formation month and designated months to achieve the every third month requirement with sampling once per quarter during the year. A water system can remain in compliance without sampling in a designated month on their monitoring schedule provided that no more than three months has passed between samples due to more frequent sampling, and the designated month was not their peak DBP formation month.

Aqua Man

Quiz Answers

Answers to the drinking water quiz published in the winter 2014 issue of *Aqua Talk*.

1. Who is legally responsible for ensuring monitoring samples are taken, submitted to the lab and reported to the state? *C. Owner of the drinking water system*
2. Who can take monitoring samples? *D. Anyone assigned under the supervision of the ORC*
3. The administrative contact receives all billing, compliance and enforcement notices from the division. This person is the: *A. Legal contact designated by the owner of the water system*
4. The owner of the drinking water system is required to notify the division of the name and contact information of the operator in responsible charge. *True*
5. Who may make process control and/or system integrity decisions in a water facility? *A. Operator in responsible charge and B. Operator certified at or above the classification of the water facility*
6. I have a two year grace period after my certificate expires to renew. *False*
7. The day after my certificate expires: *A. My certificate is invalid and I am no longer a certified operator; B. If I'm an ORC, I've caused my employer(s) to be in violation of Reg100 ; C. I have two years to restore the certificate by completing the renewal process before I have to re-take the exam; and D. I must pay an additional $50 late fee when I apply to renew my certificate*
8. If an operator's certificate has been expired for more than two years, it is automatically revoked. To re-certify the operator must: *B. Submit an application to take the entry level exam.*

Coming Down the Pipe…

Update on the Revised Total Coliform Rule (RTCR) and Colorado Initiatives Rulemaking – Colorado Primary Drinking Water Regulations

by Jennifer Townsend, PE, Drinking Water Compliance Assurance Section Manager

In February 2013, the Environmental Protection Agency published the revised total coliform rule. In order to maintain primary enforcement authority of the Colorado Primary Drinking Water Regulations, the Safe Drinking Water Program is required to adopt the rule by February 2015. In addition to adopting the rule, the program will address the following issues in this rulemaking:

- Revised total coliform rule.
- Storage tanks.
- Water haulers.
- Cross-connection control rule.
- Distribution system residual disinfectant.
- Log inactivation calculations for surface water systems.
- Various other clean up and clarifying changes.

The RTCR and Colorado Initiatives rulemaking is scheduled with the Water Quality Control Commission for Jan. 12, 2015. Because the RTCR affects all public water systems in the state, the entire regulated community was asked to participate as stakeholders. The stakeholder process began in January 2014 and is on-going through June 2014. The stakeholder process involves initial concept meetings, advisory group concept meetings, language review meetings and final meetings. Each part of the stakeholder process includes program presentations, a request for and discussion of stakeholder feedback and program staff address stakeholder feedback and comments as part of the work in developing the final, draft language.

For updated information, details and opportunities to review progress on the draft regulations, please visit the division's rulemaking page at www.colorado.gov/cdphe/wqcd under the What's New box, selecting Drinking Water RTCR and Colorado Initiatives Rulemaking or by entering the following link into a web browser:

http://www.colorado.gov/cs/Satellite?c=Page&childpagename=CDPHE-WQ%2FCBONLayout&cid=1251648666066&pagename=CBONWrapper ♦

Facility Operator Program

by Jackie Whelan, Facility Operator Program

The *Water and Wastewater Facility Operators Certification Requirements*, Regulation 100, requires owners to ensure all water and wastewater facilities operate under the direct supervision of a certified operator and the regulation outlines certification requirements.

Training: Basic training is available at no charge by downloading *Operator Basics* at Montana University Water Center watercenter.montana.edu. This training course is often sufficient preparation to pass entry level exams in water and wastewater. Additional training is available from many sources. Board approved courses can be found on the Operator Certification Program Office's (OCPO) website at www.ocpoweb.com.

Each certification is valid for three years. Professional development requirements must be completed within the three year period. Many training opportunities offered by the Water Quality Control Division and are free or low cost to facilitate the on-going education requirements. A list of board approved courses for training units is available on the Operator Certification Program Office website.

Passing the appropriate level exam is required for certification. Exams are taken sequentially starting at level D for treatment and level 1 for collection or distribution. Exams are offered three times each year. The deadlines to submit exam applications are March 1, July 1 and Nov. 1; there are multiple exam dates and locations in each exam cycle. For an additional fee electronic testing at the OCPO office is available. Information regarding certification exams is available by contacting OCPO at 303-394-8994 or www.ocpoweb.com.

Applications, fees, submission deadlines and other exam information are available through OCPO. Colorado specific need-to-know study topics are also listed on their website.

Operator in responsible charge changes: The owner/permittee with a new ORC must submit a contact update form to the division within 30 days of the change. Forms are available at www.colorado.gov/cdphe/wqcd. As a courtesy please notify the division in writing if you are the certified operator/ORC and are leaving the facility. Please include your name, the name of the system, the PWSID number or permit number and the effective date of separation.

Additional information is available on the division's website at www.colorado.gov/cdphe/wqcd, under services click on facility operator certification. ♦

To all readers:

Have some time saving helpful hints or tips to share with fellow operators? Can Aqua Man answer your question? Is there a topic you would like discussed? Contact Jacki Main by

- email: jacklyn.main@state.co.us
- phone: 303-692-3665
- fax: 303-782-0390
- mail: WQCD, 4300 Cherry Creek Drive South, Denver, CO 80247

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Water operator training opportunities	www.colorado.gov/cdphe/dwtraining.com
Aqua Talk online	www.colorado.gov/cdphe/aquatalk.com
Inspection services	www.colorado.gov/cdphe/wqinspectionservices
Contact list for drinking water regulations	www.colorado.gov/cdphe/wqcd

Colorado Safe Drinking Water Program
Aqua Talk

Aqua Talk Newsletter

Editorial team: Ron Falco, Jacki Main, Mike Bacon, Armando Herald, Jennifer Townsend, Corrina Quintana, Doug Camrud, Jackie Whelan. Contributing authors: Nicole Graziano, John Duggan and David Dani.

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Editor: Jacki Main

Purpose: To communicate division drinking water-related issues to stakeholders in a fun and informative format.