

Staff Operations Item 1



ERIE COUNTY WATER AUTHORITY INTEROFFICE MEMORANDUM

April 3, 2024

TO: Jerome D. Schad, Chair
Peggy A. LaGree, Vice Chair
Michele M. Ianello, Treasurer

FROM: Sabrina A. Figler, Director of Water Quality

SUBJECT: Return to EPA LCR Lead & Copper **Reduced** Monitoring

On February 9, 2023, the New York State Department of Health (NYSDOH) returned ECWA to Standard Monitoring under the current EPA Lead and Copper Rule (LCR), effective January 1, 2023. LCR Standard Monitoring required the sampling of one hundred Tier One sites, or single-family residences, every 6 months. Fifty of these one hundred sites were required to be homes with a lead service line, fifty were required to be homes with copper with lead solder.

The NYSDOH, on March 12, 2024, notified ECWA that it had reviewed all records provided to them including ECWA's lead and copper tap sample monitoring results; water quality parameter (WQP) monitoring results; and corrosion control desktop evaluation, dated February 2020. Based on their review and recommendations from the corrosion control evaluation, the NYSDOH designated the optimal corrosion control treatment WQP's, for our system.

As a result of the new setting of optimal WQP's, or "OWQP's," effective immediately, the NYSDOH has returned ECWA to Reduced Lead and Copper Monitoring under the current LCR. This means ECWA is to sample 50 Tier One sites, or single-family homes, within one six-month period of June 1st and September 30th. Twenty-five of these fifty sites are required to be homes with a lead service line, and twenty-five are required to be homes with copper with lead solder.

The new SDWIS State Water Sample Schedule Report is attached with the new lead and copper sample requirement and new OWQP requirements highlighted.

cc: Charles Eaton, COO
Lenard Kowalski, Executive Engineer
Terry McKracken, Secretary

SDWIS/State Water Sample Schedule Report

ECWA DIRECT PWS ID: NY1400443

Due 2024 Contaminant (Group)/ Sample Location/Frequency	Last Compliance Results	Sample Requirements
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Coliform, Total (TCR)

<input checked="" type="checkbox"/>	Location: Distribution System Frequency: 210 Samples Monthly	210 Samples must be collected every month.
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Alkalinity, Total

<input checked="" type="checkbox"/>	Location: DISTRIBUTION SYSTEM ID: DS-001 Frequency: 50 Samples Every 6 months Sample Point: GENERAL DISTRIBUTIO Sample Point No.: DS-001 Sample Point Type: DS-Distribution System	50 Samples must be collected by 6/30/2024
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Samples must be collected from 25 distribution system locations twice during each monitoring period. Samples must be analyzed for pH and alkalinity. Sample locations shall be representative of water throughout the distribution system. These are not first draw samples and do not need to be collected from lead and copper sample sites.

<input checked="" type="checkbox"/>	Location: VAN DE WATER WTP ID: TP-001 Frequency: 1 Sample Monthly Sample Point: RAW WATER Sample Point No.: TOC-ALK-1 Sample Point Type: RW-Raw Water Source	1 Sample must be collected every month.
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The raw water sample must be collected at the same time as the raw water TOC sample.

<input checked="" type="checkbox"/>	Location: STURGEON POINT WTP ID: TP-002 Frequency: 1 Sample Monthly Sample Point: RAW WATER Sample Point No.: TOC/ALK-2 Sample Point Type: RW-Raw Water Source	1 Sample must be collected every month.
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The raw water sample must be collected at the same time as the raw water TOC sample.

Asbestos

<input checked="" type="checkbox"/>	Location: DISTRIBUTION SYSTEM ID: DS-001 Frequency: 1 Sample Every 9 years Sample Point: GENERAL DISTRIBUTIO Sample Point No.: DS-001 Sample Point Type: DS-Distribution System	Samples last collected: 12/22/2015	Sample must be collected by 12/31/2024
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You are required to take a sample from each area served by asbestos-cement pipe and have it analyzed for asbestos.

Nitrate

<input checked="" type="checkbox"/>	Location: VAN DE WATER WTP ID: TP-001 Frequency: 1 Sample Yearly Sample Point: VAN DE WATER WTP Sample Point No.: EP-001 Sample Point Type: EP-Entry Point	Samples last collected: 7/31/2023	Sample must be collected by 12/31/2024
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<input checked="" type="checkbox"/>	Location: STURGEON POINT WTP ID: TP-002 Frequency: 1 Sample Yearly Sample Point: STURGEON POINT WTP Sample Point No.: EP-002 Sample Point Type: EP-Entry Point	Samples last collected: 7/31/2023	Sample must be collected by 12/31/2024
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Part 5-1.42 and 5-1.47 - Lead and Copper

<input checked="" type="checkbox"/>	Location: DISTRIBUTION SYSTEM ID: DS-001 Frequency: 50 Samples Yearly	105 Samples Collected on or Before: 11/8/2023	Next 50 samples must be collected between 6/1 and 9/30 within a single year by 9/30/2024
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SDWIS/State Water Sample Schedule Report

ECWA DIRECT PWS ID: NY1400443

Due Contaminant (Group)/

2024 Sample Location/Frequency

Last Compliance Results

Sample Requirements

Samples must be collected from the same sample points, listed in your monitoring plan, during each round of monitoring or ECHD notified of changes prior to sampling. The rule requires that the sample size for these samples be 1000 ml. Please confirm with your laboratory that you have received the correct bottles and that they are 1000 ml. Any samples taken in sample bottles that are less than 1000 ml will not count towards your compliance monitoring.

Part 5-1.52 Table 8B - Primary Inorganic Chemicals

<input checked="" type="checkbox"/>	<p>Location: VAN DE WATER WTP ID: TP-001 Frequency: 1 Sample Yearly Sample Point: VAN DE WATER WTP Sample Point No.: EP-001 Sample Point Type: EP-Entry Point</p>	<p>Samples last collected: 10/19/2023</p>	<p>Sample must be collected by 12/31/2024</p>
<input checked="" type="checkbox"/>	<p>Location: STURGEON POINT WTP ID: TP-002 Frequency: 1 Sample Yearly Sample Point: STURGEON POINT WTP Sample Point No.: EP-002 Sample Point Type: EP-Entry Point</p>	<p>Samples last collected: 10/19/2023</p>	<p>Sample must be collected by 12/31/2024</p>

Part 5-1.52 Table 9A - Disinfection Byproducts/Stage 2

<input checked="" type="checkbox"/>	<p>Location: DISTRIBUTION SYSTEM ID: DS-001 Frequency: 12 Samples Quarterly Sample Point: DISTRIBUTION SYSTEM Sample Point No.: LRAA1369 Sample Point Type: DS-Distribution System Sample Point: DISTRIBUTION SYSTEM Sample Point No.: LRAA1370 Sample Point Type: DS-Distribution System Sample Point: ORCHARD PARK; 3330 BAKER RD Sample Point No.: LRAA291 Sample Point Type: DS-Distribution System Sample Point: LACKAWANNA; 1630 ABBOTT RD Sample Point No.: LRAA340 Sample Point Type: DS-Distribution System Sample Point: NEWSTEAD; 11587 RAPIDS RD Sample Point No.: LRAA393 Sample Point Type: DS-Distribution System Sample Point: EDEN; EAST EDEN RD Sample Point No.: LRAA402 Sample Point Type: DS-Distribution System Sample Point: ORCHARD PARK; BENNING RD Sample Point No.: LRAA433 Sample Point Type: DS-Distribution System Sample Point: BOSTON; ZIMMERMAN RD Sample Point No.: LRAA484 Sample Point Type: DS-Distribution System Sample Point: MARILLA; 11633 CLINTON ST Sample Point No.: LRAA491 Sample Point Type: DS-Distribution System Sample Point: CONCORD; TREVETT RD Sample Point No.: LRAA523 Sample Point Type: DS-Distribution System Sample Point: TONAWANDA; 150 NIAGARA ST Sample Point No.: LRAA527 Sample Point Type: DS-Distribution System</p>	<p>Samples last collected: 11/20/2023</p>	<p>12 Samples must be collected each calendar quarter.</p>
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SDWIS/State Water Sample Schedule Report

ECWA DIRECT PWS ID: NY1400443

Due Contaminant (Group)/

2024 Sample Location/Frequency

Last Compliance Results

Sample Requirements

Sample Point: BOSTON; 7684 WOHLHUETER RD
 Sample Point No.: LRAA530
 Sample Point Type: DS-Distribution System

Sample must be taken in the same week of February, May, August and November of each year per your Stage 2 DBP monitoring plan.

Part 5-1.52 Table 9B - Principal Organic Chemicals

<input checked="" type="checkbox"/> <p>Location: VAN DE WATER WTP ID: TP-001 Frequency: 1 Sample Yearly Sample Point: VAN DE WATER WTP Sample Point No.: EP-001 Sample Point Type: EP-Entry Point</p>	Samples last collected: 2/17/2023	Sample must be collected by 12/31/2024
<input checked="" type="checkbox"/> <p>Location: STURGEON POINT WTP ID: TP-002 Frequency: 1 Sample Yearly Sample Point: STURGEON POINT WTP Sample Point No.: EP-002 Sample Point Type: EP-Entry Point</p>	Samples last collected: 2/17/2023	Sample must be collected by 12/31/2024

Part 5-1.52 Table 9C - PFOA, PFOS and 1,4-Dioxane

<input checked="" type="checkbox"/> <p>Location: VAN DE WATER WTP ID: TP-001 Frequency: 1 Sample Quarterly Sample Point: VAN DE WATER WTP Sample Point No.: EP-001 Sample Point Type: EP-Entry Point</p>	Samples last collected: 10/23/2023	1 Sample must be collected each calendar quarter.
<input checked="" type="checkbox"/> <p>Location: STURGEON POINT WTP ID: TP-002 Frequency: 1 Sample Quarterly Sample Point: STURGEON POINT WTP Sample Point No.: EP-002 Sample Point Type: EP-Entry Point</p>	Samples last collected: 10/23/2023	1 Sample must be collected each calendar quarter.

Part 5-145(c) - Lead and Copper Water Quality Parameters

<input checked="" type="checkbox"/> <p>Location: VAN DE WATER WTP ID: TP-001 Frequency: 1 Sample Every two weeks Sample Point: VAN DE WATER WTP Sample Point No.: EP-001 Sample Point Type: EP-Entry Point</p> <p>Samples must be analyzed for pH and alkalinity. Designated range for pH is 7.4 - 8.4 (8.0 goal) per notice from BWSP dated 3/12/24.</p>	<input checked="" type="checkbox"/> <p>Location: STURGEON POINT WTP ID: TP-002 Frequency: 1 Sample Every two weeks Sample Point: STURGEON POINT WTP Sample Point No.: EP-002 Sample Point Type: EP-Entry Point</p> <p>Samples must be analyzed for pH and alkalinity. Designated range for pH is 7.4 - 8.4 (8.0 goal) per notice from BWSP dated 3/12/24.</p>
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Ph

<input checked="" type="checkbox"/> <p>Location: DISTRIBUTION SYSTEM ID: DS-001 Frequency: 50 Samples Every 6 months Sample Point: GENERAL DISTRIBUTIO Sample Point No.: DS-001 Sample Point Type: DS-Distribution System</p>	50 Samples must be collected by 6/30/2024
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SDWIS/State Water Sample Schedule Report

ECWA DIRECT PWS ID: NY1400443

Due Contaminant (Group)/

2024 Sample Location/Frequency

Last Compliance Results

Sample Requirements

Samples must be collected from 25 distribution system locations twice during each monitoring period. Samples must be analyzed for pH and alkalinity. Sample locations shall be representative of water throughout the distribution system. These are not first draw samples and do not need to be collected from lead and copper sample sites. Designated range for pH is 7.4 - 8.4 (8.0 goal) per notice from BWSP dated 3/12/24.

Total Organic Carbon (Toc)

Location: VAN DE WATER WTP ID: TP-001 **2 Samples must be collected every month.**

Frequency: 2 Samples Monthly

Sample Point: FINISHED WATER
Sample Point No.: TOC-1
Sample Point Type: PC-Process Control

Sample Point: RAW WATER
Sample Point No.: TOC-ALK-1
Sample Point Type: RW-Raw Water Source

Raw water sample shall be collected prior to treatment. The finished water sample must be taken no later than the point of combined filter effluent turbidity monitoring.

Location: STURGEON POINT WTP ID: TP-002 **2 Samples must be collected every month.**

Frequency: 2 Samples Monthly

Sample Point: RAW WATER
Sample Point No.: TOC/ALK-2
Sample Point Type: RW-Raw Water Source

Sample Point: FINISHED WATER
Sample Point No.: TOC-2
Sample Point Type: PC-Process Control

Raw water sample shall be collected prior to treatment. The finished water sample must be taken no later than the point of combined filter effluent turbidity monitoring.

Part 5-1.52 Table 12 - Radiological

Location: VAN DE WATER WTP ID: TP-001 Samples last collected: **Next sample must be collected by 12/31/2028**
Frequency: 1 Sample Every 9 years 7/24/2019

Sample Point: VANDE WATER WTP
Sample Point No.: EP-001
Sample Point Type: EP-Entry Point

Must sample for Gross Alpha, Radium-226 and Radium 228. If the Gross Alpha result is greater than 15pCi/L then you must also sample for Uranium.

Location: STURGEON POINT WTP ID: TP-002 Samples last collected: **Next sample must be collected by 12/31/2028**
Frequency: 1 Sample Every 9 years 7/24/2019

Sample Point: STURGEON POINT WTP
Sample Point No.: EP-002
Sample Point Type: EP-Entry Point

Must sample for Gross Alpha, Radium-226 and Radium 228. If the Gross Alpha result is greater than 15pCi/L then you must also sample for Uranium.

Part 5-1.52 Table 9C - Synthetic Organic Chemicals

Location: VAN DE WATER WTP ID: TP-001 Samples last collected: **Next sample must be collected by 6/30/2025**
Frequency: 1 Sample Every 18 Months 3/27/2023

Sample Point: VAN DE WATER WTP
Sample Point No.: EP-001
Sample Point Type: EP-Entry Point

Please note that New York State has granted a general waiver from monitoring diquat, endothall, and glyphosate. In addition all surface water systems in the state have been granted a waiver from monitoring of EDB (ethylene dibromide) and DBCP (1,2-dibromo-3-chloropropane).

Location: STURGEON POINT WTP ID: TP-002 Samples last collected: **Next sample must be collected by 6/30/2025**
Frequency: 1 Sample Every 18 Months 3/27/2023

SDWIS/State Water Sample Schedule Report

ECWA DIRECT PWS ID: NY1400443

Due Contaminant (Group)/

2024 Sample Location/Frequency

Sample Point: STURGEON POINT WTP

Sample Point No.: EP-002

Sample Point Type: EP-Entry Point

Last Compliance Results

Sample Requirements

Please note that New York State has granted a general waiver from monitoring diquat, endothall, and glyphosate. In addition all surface water systems in the state have been granted a waiver from monitoring of EDB (ethylene dibromide) and DBCP (1,2-dibromo-3-chloropropane).