



States' Perspective

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Presentation Outline

- Thanks – glad to be here
- ASDWA's Priorities
 - Funding
 - 5 Non-Regulatory Drivers
 - AWIA Implementation

Funding

- Funding is tight (pretty much) for everyone in the water sector
 - Utilities, consultants, manufacturers, researchers, EPA, state primacy agencies, etc.
 - Possibility of new federal funding is questionable at best
 - AWIA authorizations -> appropriations are another matter
- States are getting a “double-whammy”
 - Flat PWSS funding -> inflation impacts
 - Additional demands from non-regulatory drivers
 - 5 non-regulatory drivers will be discussed later

2018 Demands on State Resources

- 2013 national report by EPA/Cadmus/ASDWA predicted demands 2012-2022
 - Existing funding gap ranged from 38%-41%
- Asked states to estimate the additional demands from 5 non-regulatory drivers
- Surveyed all ASDWA members -> summer
 - Additional demands ranged from 1.1%-12.5%
 - Average increase of 4.3%
- 10 years of flat PWSS funding results in another 20% funding gap from inflation

Beyond Tight Budgets

- Combined existing funding gap, inflation, CoSTS, and survey
 - Total gap -> 73%
- Additional demand from EPA's new breakthrough measure to reduce non-compliance
 - Guesstimate of 5% average increase in states' demands
- What can states NOT do given this gap??

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Beyond Tight Budgets

2018 Resource Demands Analysis for State Drinking Water Programs

Five Non-Regulatory Drivers

1. Post-Flint LCR suggestions/recommendations
2. *Legionella* and building water quality management plans
 - CMS memorandum in July 2017
3. PFAS
 - Health advisories & community engagements
4. Algal toxins
 - Health advisories and UCMR4
5. SDWIS Prime

Post-Flint LCR Actions

- Memos from Asst. Administrator for Water led to a variety of actions by many states
 - Reviewed sampling plans & corrosion control plans
- State legislatures have passed their own laws
 - Lead testing in schools
 - Distribution system materials inventories
- Other actions depend on the state

Legionella & Building Water Quality Management Plans

- States' role?
- Water systems' role?
- What monitoring to conduct and how to react?
- States lack experience/expertise with building water quality management plans
- Secondary disinfection in buildings
 - Many SDWA rules don't fit well such as operator certification
- Two new ASDWA projects – states' roles

PFAS

- Generally ubiquitous class of compounds
 - Approx. 30 states with problems
- Hundreds of potential problematic chemicals
 - PFOA, PFOS, GenX, PFBS, etc.
- EPA's community engagements & mgmt. plan
- EPA developed 2 additional toxicity values
 - Risk communication is key
- Policy question – are standards better than health advisories or toxicity values?
 - When is a national regulation warranted??

Algal Toxins

- Extent of problem can vary from year to year
 - Some states (OH, OR & others) taking steps
 - Oregon – Emergency rule transitioning to permanent
- UCMR4 monitoring increasing the attention from public and the media
 - Still a debate on the accuracies of ELISA versus LC/MS/MS analytical methods
- 10-day health advisories provide systems some chance to “do something”
 - Make treatment changes (if they can)

SDWIS Prime

- EPA has working to update/replace SDWIS and SDWIS-State for about a decade
 - Getting close, but still a long ways to go for states to end up with full functionality
 - States have lots of interfacing applications
 - Prime v1.0 won't be “everything for everybody”
 - How long will EPA support SDWIS/State for the transition(s)?
- Pilot testing by 5 states/1 Region starts in Sept.
 - Pilot testing will continue into 2019
- Prime v1.0 release in early 2019
 - Likely lots of bumps in the road in 2019 & 2020
 - Major effort for ASDWA to assist states where possible

AWIA Implementation

- EPA is developing two regulations by 10/20
 - Consolidation
 - CCR readability
 - What role will states have?
- New system security & preparedness req.
 - Risk Assessment (RA)
 - Revise Emergency Response Plan (ERP) based on RA
 - Direct implementation by EPA
 - What role might (possibly) states have?



Questions?

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