

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ANNUAL COMPLIANCE REPORT

for

PUBLIC WATER SYSTEMS

in the

DISTRICT OF COLUMBIA

during

CALENDAR YEAR 2005

INTRODUCTION

The Drinking Water Program: An Overview

The U.S. Environmental Protection Agency (EPA) established the Public Water System Supervision (PWSS) Program under the authority of the 1974 Safe Drinking Water Act (SDWA). Under the SDWA and the 1986 and 1996 Amendments, EPA sets national limits on contaminant levels in drinking water to ensure that the water is safe for human consumption. These limits are known as Maximum Contaminant Levels (MCLs) and Maximum Residual Disinfectant Levels (MRDLs). For some regulations, EPA establishes treatment techniques in lieu of an MCL to control unacceptable levels of contaminants in water. The Agency also regulates how often public water systems (PWSs) monitor their water for contaminants and report the monitoring results to the States or EPA. Generally, the larger the population served by a water system, the more frequent the monitoring and reporting (M/R) requirements. In addition, EPA requires PWSs to monitor for selected unregulated contaminants to provide data for future regulatory development. Finally, EPA requires PWSs to notify the public when they have violated these regulations. The 1996 Amendments to the SDWA require public notification to include a clear and understandable explanation of the nature of the violation, its potential adverse health effects; steps that the PWS is undertaking to correct the violation and the possibility of alternative water supplies during the violation.

The SDWA applies to the 50 States, the District of Columbia, Indian Lands, Puerto Rico, the Virgin Islands, American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands.

The SDWA allows States and Territories to seek EPA approval to administer their own PWSS Programs. The authority to run a PWSS Program is called primacy. For a state to receive primacy, EPA must determine that the state meets certain requirements laid out in the SDWA and the regulations, including the adoption of drinking water regulations that are at least as stringent as the Federal regulations and a demonstration that they can enforce the program requirements. Of the 56 States and Territories, all but Wyoming and the District of Columbia have primacy. The EPA Regional Offices administer the PWSS Programs within these two jurisdictions. Thus, the EPA Region III Office, in Philadelphia, PA, administers the PWSS Program in the District of Columbia.

The 1986 SDWA Amendments gave Indian Tribes the right to apply for and receive primacy. EPA currently administers PWSS Programs on all Indian lands except the Navaho Nation, which was granted primacy in late 2000.

Annual State PWS Report

Each quarter, primacy states submit data to the Safe Drinking Water Information System (SDWIS), an automated database maintained by EPA. The data submitted include, but are not limited to, PWS inventory information; the incidence of Maximum Contaminant Level (MCL), Maximum Residual Disinfectant Level (MRDL), monitoring and treatment technique violations; and information on enforcement activity related to these violations. Section 1414(c)(3) of the Safe Drinking Water Act requires states to provide EPA with an annual report of violations of the primary drinking water standards. This report provides the numbers of violations in each of six categories: MCLs, MRDLs, treatment techniques, variances and exemptions, significant monitoring violations, and significant consumer notification violations. The EPA Regional Offices report the information for Wyoming, the District of Columbia, and all Indian Lands but the Navaho Nation. EPA Regional offices also report Federal enforcement actions taken in those locations. Data retrieved from SDWIS form the basis of this report. A summary of calendar year 2005 violations for the District of Columbia is included in Appendix A of this report.

DEFINITIONS

Public Water System

A Public Water System (PWS) is defined as a system that provides water via piping or other constructed conveyances for human consumption to at least 15 service connections or serves an average of at least 25 people for at least 60 days each year. There are three types of PWSs. PWSs can be community (such as cities and towns), nontransient noncommunity (such as schools or factories), or transient noncommunity systems (such as rest stops or parks). For this report, when the acronym "PWS" is used, it means systems of all types unless specified in greater detail. The principal community PWSs in the District of Columbia are the Washington Aqueduct Division of the U.S. Army Corps of Engineers (Aqueduct), and the District of Columbia Water and Sewer Authority (DC WASA).

In addition to the above, three (3) facilities in the District which are owned and operated by the U.S. Navy are consecutive PWSs subject to the requirements of the SDWA. These systems, which purchase water from DC WASA, are: Naval Station Washington (Washington Navy Yard); Naval Station Washington (Anacostia); and Naval Observatory. These PWSs continued compliance monitoring in calendar year 2005. The Naval Security Station was deactivated as a public water system in April 2005 after its management was transferred to the General Services Administration.

In November 2005, EPA Region III determined that Bolling Air Force Base (AFB) also met the definition of a public water system. Bolling AFB was required to perform compliance monitoring in 2006.

Maximum Contaminant Level

Under the Safe Drinking Water Act, the EPA sets national limits on contaminant levels in drinking water to ensure that the water is safe for human consumption. These limits are known as Maximum Contaminant Levels (MCLs). During calendar year 2005, no MCL violations occurred at any PWS in the District of Columbia.

Maximum Residual Disinfectant Level

The EPA sets national limits on residual disinfectant levels in drinking water to reduce the risk of exposure to disinfection byproducts formed when public water systems add chemical disinfectant for either primary disinfection or for secondary disinfection to provide a residual disinfectant in the distribution system. These levels are known as Maximum Residual Disinfectant Levels (MRDLs). During calendar year 2005, no MRDL violations occurred at any PWS in the District of Columbia.

Treatment Techniques

For some regulations, the EPA establishes treatment techniques (TTs) in lieu of an MCL to control unacceptable levels of certain contaminants. For example, treatment techniques have been established for viruses, some bacteria, and turbidity. In addition, the Lead and Copper Rule (LCR) specifies two types of activities - providing educational materials on lead to water system customers and replacement of lead water service lines - which must be performed by systems that exceed the lead action level. These activities are considered treatment technique requirements under the LCR.

As part of a utility's lead service line replacement (LSLR) program, the LCR requires that the water system either provide customers with notice 45 days prior to commencing partial replacement of a lead service line or seek a waiver of the advance notice requirement. During the October 1, 2004 to September 30, 2005 compliance period, DC WASA failed to provide notice 45 days in advance for several locations. Although DC WASA requested and EPA approved waivers during this period, waivers were not granted for these locations. Therefore, this is considered a treatment technique violation of the LCR.

When a PWS conducts lead and copper tap sampling and exceeds the action level for lead, the PWS is required to implement a public education program concerning lead in drinking water for its customers. During calendar year 2005, no treatment technique violations for lead public education requirements occurred at any PWS in the District of Columbia.

No treatment technique violations occurred at any of the other PWSs in the District of Columbia during calendar year 2005.

Variations and Exemptions

Although variances and exemptions to specific requirements under the Safe Drinking Water Act Amendments of 1996 may be granted under certain circumstances, EPA has never issued any variances or exemptions to the public water systems in the District of Columbia.

Monitoring

A PWS is required to monitor and verify that the levels of contaminants present in the water do not exceed the MCL. If a PWS fails to have its water tested as required, or fails to report test results correctly to the primacy agency, a monitoring violation occurs.

Monitoring for most chemical contaminants is done at the point(s) where water from the water treatment plant(s) enters the water storage and distribution system. The exceptions are bacteriological contaminants, disinfection byproducts, and lead and copper which are monitored at specific locations in the distribution system.

In the third quarter of 2003, the Washington Aqueduct incurred a monitoring violation for the synthetic organic chemical glyphosate. The violation occurred because the Aqueduct's contract laboratory failed to analyze a quarterly sample collected by Aqueduct staff and a replacement sample was not taken. The violation was issued in 2005. No prior or subsequent samples have detected this contaminant.

In October 2004, DC WASA incurred two (2) monitoring violations of the Stage 1 Disinfectants and Disinfection Byproducts (DBP) Rule because it failed to notify EPA of a change in a DBP sample location and obtain approval from EPA prior to sampling at the new location. Two violations were issued because DC WASA collects samples for two types of DBPs (trihalomethanes and haloacetic acids) at each location. The violations were issued in calendar year 2005.

During calendar year 2005, no violations of the monitoring requirements of the National Primary Drinking Water Regulations (NPDWRs) occurred at any of the other PWSs in the District of Columbia.

Significant Monitoring Violations

For this report, significant monitoring violations are generally defined as any significant monitoring violation that occurred during the calendar year of the compliance report. A significant monitoring violation, with rare exceptions, occurs when no samples were taken or no results were reported during a compliance period. During calendar year 2005, no significant monitoring violations occurred at any PWS in the District of Columbia.

Consumer Notification

Every Community Water System is required by the Consumer Confidence Report Rule to

deliver to its customers a brief annual water quality report. This report includes some educational material, and provides information on the source water, the levels of any detected contaminants, and compliance with drinking water regulations. During calendar year 2005, DC WASA incurred a violation for submitting the annual Consumer Confidence Report (CCR) to EPA on July 11, 2005, ten (10) days past the deadline. DC WASA did distribute the CCR to its customers prior to the July 1, 2005 deadline. During calendar year 2005, no consumer notification violations occurred at any other PWS in the District of Columbia.

The Public Notification (PN) Rule requires a PWS that has incurred a violation, or violations, of the drinking water regulations to notify its customers about the violation(s) and to provide health advisory information. During calendar year 2005, no public notification violations occurred at any PWS in the District of Columbia.

Significant Consumer Notification Violations

For this report, a significant consumer notification violation occurred if a community water system completely failed to provide its customers the required annual water quality report. During calendar year 2005, no significant consumer notification violations occurred at any PWS in the District of Columbia.

DISTRICT OF COLUMBIA INFORMATION

Public Water Systems in the District of Columbia

There are two principal public water systems in the District of Columbia: 1) the Washington Aqueduct Division of the U.S. Army Corps of Engineers (the Aqueduct); and, 2) the District of Columbia Water and Sewer Authority (DC WASA). The Aqueduct owns and operates two water intakes on the Potomac River in Maryland, two water treatment plants in the District of Columbia, and three finished water storage reservoirs. The treatment plants, Dalecarlia and McMillan, can produce up to 340 million gallons per day (MGD) of potable water for the metropolitan Washington area.

The Aqueduct is a water wholesaler, and as such, has no distribution system of its own. Its primary customer is DC WASA, which owns and operates eight finished water storage facilities and the water distribution system within the District. DCWASA does not further treat the water in any way. (It should be noted that prior to the creation of DC WASA on October 1, 1996, the water distribution system was owned and operated by the former Water and Sewer Utility Administration (WASUA) which was part of the District of Columbia Department of Public Works.)

Three (3) facilities in the District which are owned and operated by the U.S. Navy are consecutive PWSs subject to the requirements of the SDWA. These systems, which purchase all of their water from DC WASA, are: Naval Station Washington (Washington Navy Yard); Naval Station Washington (Anacostia); and Naval Observatory. In 2005, Bolling Air Force Base was

also identified as a PWS. None of the Navy or Air Force facilities provides additional water treatment.

In addition to DC WASA, the Aqueduct supplies water to three customer PWSs in the Commonwealth of Virginia: Arlington County, the City of Falls Church, and Ronald Reagan Washington National Airport. These customer water systems are regulated by the Virginia Department of Health which has primacy for implementation of the PWSS Program in the Commonwealth.

For reference in SDWIS, the water systems are listed below along with their PWS identification numbers:

DC0000001	Washington Aqueduct
DC0000002	District of Columbia Water and Sewer Authority
DC0000003	Naval Station Washington (Washington Navy Yard)
DC0000004	Naval Station Washington (Anacostia)
DC0000005	Naval Observatory
DC0000007	Bolling Air Force Base
VA6013010	Arlington County Department of Public Works
VA6013080	Ronald Reagan Washington National Airport
VA6610100	City of Falls Church Department of Public Utilities

The Aqueduct produces an average of 180 MGD of drinking water for the water systems listed above which have a total population of about one million. The District, with a total population of approximately 600,000, consumes about 75 per cent of the Aqueduct's production. Although the District has about 60 per cent of the population served by the Aqueduct, it uses more water because it has a large transient population of commuters and tourists.

Because the Aqueduct and DC WASA have individual responsibilities for complying with the SDWA, both systems need to work together to ensure that the District's drinking water meets federal standards. The Aqueduct is responsible for compliance with all of the regulations which pertain to water treatment such as filtration, disinfection and chemical contaminant removal, and corrosion control. DC WASA is responsible for the regulations for total coliform, lead and copper, and disinfection byproducts, which are applicable to the distribution system. The water treatment techniques applied by the Aqueduct directly affect the quality of the water in DC WASA's system.

The Aqueduct provides significant formal and informal assistance to DC WASA in complying with the monitoring and reporting requirements of the SDWA. The Aqueduct collects and provides analytical services for all of the required distribution system entry point samples for organic and inorganic chemical contaminants, which satisfies the requirements for itself as well as its customer PWSs. In addition, the Aqueduct provides contractual laboratory services for DC WASA. Laboratory staff collect all of the disinfection byproduct samples and some of the bacteriological samples from DC WASA's distribution system. The Aqueduct's laboratory also analyzes all of the bacteriological and disinfection byproduct samples collected from DC

WASA's distribution system. Responsibility for compliance with lead and copper monitoring is split between the Aqueduct and DC WASA. DC WASA arranges for the collection of lead and copper samples at customers' taps and the Aqueduct laboratory performs the analyses as provided by its contract with DC WASA. The Aqueduct and DC WASA staff also collect and analyze the distribution system samples required for the assessment of optimal corrosion control treatment. On an annual basis, the Aqueduct's laboratory collects and analyzes over 35,000 samples for more than 125 parameters.

The Aqueduct compiles the results of the analyses of compliance samples. The Aqueduct includes this data in the monthly monitoring report it submits to EPA Region III. Other data is forwarded to DC WASA for use in preparing their monitoring reports, which are also submitted to EPA Region III.

Lead and Copper Rule Compliance Actions

A discussion of DC WASA's Lead and Copper Rule (LCR) compliance actions for calendar year 2005 is provided below. For additional information on DC WASA's compliance with the LCR, please see the 2004 Annual Compliance Report for the District of Columbia.

Lead and Copper Tap Sampling

After exceeding the lead action level (AL) for both monitoring periods of 2004 (January 1 – June 30 and July 1 – December 31), DC WASA conducted monitoring for lead and copper at customers' taps in calendar year 2005. DC WASA met the lead AL for both monitoring periods: 0.015 mg/L for the January 1, 2005 to June 30, 2005 monitoring period and 0.015 mg/L for the July 1, 2005 to December 31, 2005 monitoring period. DC WASA did not exceed the copper AL in either monitoring period.

Sample Invalidation

EPA invalidated a number of lead and copper samples taken during the July 1, 2005 to December 31, 2005 monitoring period because they were not obtained from appropriate sampling locations, as required by the LCR. The final lead and copper values were determined in May 2006 and were based on samples collected between July and December 2005 as well as samples collected in early 2006 to replace the invalidated samples.

Public Education

Although DC WASA did not exceed the lead action level in 2005, the utility performed public education (PE) activities twice during 2005. The first issuance of PE materials followed a lead action level exceedance in the second half of 2004. The second issuance of PE materials in 2005 was not a result of exceeding the lead action level, as DC WASA met the lead action level for both monitoring periods in 2005. Rather, this activity was directed by the Administrative Consent Order signed June 17, 2004.

Lead Service Line Replacement

During DC WASA's third lead service line replacement (LSLR) compliance period, October 1, 2004 to September 30, 2005, DC WASA replaced 4,137 LSLs. All of these were physical replacements. Since 2003, DC WASA has replaced over 6,300 LSLs; more than 1,000 of these replacements were reported to be at priority locations with day care facilities or at-risk populations (pregnant women or children under 6 years of age). As of August 2005, there were approximately 23,000 known lead service lines remaining in the distribution system and the composition of approximately 21,000 service lines had not been determined.

As part of DC WASA's 2005 evaluation of distribution system materials, the utility submitted a statistical analysis of service line materials. DC WASA estimated that approximately 60% of service lines remaining in their inventory could be made of lead, though this figure varies based on geography and age of housing. This means that there could be as many as 36,000 lead service lines remaining in the distribution system. DC WASA continues to test service lines to positively identify their composition and plans to replace all lead service lines in public space by 2016.

Corrosion Control Treatment

In 2004, the Technical Expert Working Group (TEWG) recommended that the Aqueduct implement the application of an orthophosphate corrosion inhibitor as a method to reduce the drinking water lead levels. In June 2004, the Aqueduct initiated the orthophosphate treatment in a small part of the distribution system to determine if the treatment might have any unanticipated effects on water quality. After it was determined that there were very few problems in the pilot area, EPA granted interim approval for this corrosion control technique, and the Aqueduct implemented full system treatment in August 2004. During 2005, DC WASA and the Aqueduct continued their testing programs to determine if other treatment options might be beneficial. None of the laboratory-scale testing results to date have indicated that orthophosphate should be discontinued in favor of another corrosion inhibitor.

LCR Compliance Determination

EPA Region III issued an Administrative Order for Compliance on Consent (AO) to DC WASA on June 17, 2004. The AO addresses violations of the Lead and Copper Rule that occurred from 1998 through 2003. In addition to a listing of the violations, the AO includes remedial actions required of DC WASA. A copy of the AO can be found on EPA's web site at www.epa.gov/dclead/aowasa617.pdf.

EPA Region III issued a Supplemental Administrative Order for Compliance on Consent (AO) to DC WASA on January 14, 2005. The Supplemental AO addressed additional violations of the LSLR requirements of the Lead and Copper Rule. A copy of the supplemental AO can be found on EPA's web site at www.epa.gov/dclead/aowasa_supplement_011905.pdf. The AO was modified on June 8, 2005 to clarify a deadline by which DC WASA must notify all customers whose lead service lines were considered "replaced" using an improper LSL sampling protocol. The AO modification can be found at www.epa.gov/dclead/WASA_AO_modification_6-8-05.pdf.

Appendix B is a table that summarizes DC WASA's status with respect to the AO. Violations addressed in the AO were discussed in detail in the 2004 Annual Compliance Report for the District of Columbia.

PWSS Program Activities in the District of Columbia

EPA Region III's Water Protection Division works closely with the Washington Aqueduct and DC WASA in the implementation of the PWSS Program in the District. The Region has provided, and in some cases continues to provide, services to the District such as the following:

- Training for water treatment plant and distribution system operators;
- Training for distribution system maintenance and repair personnel;
- Sanitary surveys of the water treatment, storage and distribution systems;
- Sanitary surveys of several large water users in the District;
- Drinking water survey of day care centers in the District;
- Assistance to the DC Department of Health in conducting a source water assessment of the Potomac River;
- Technical assistance to the Aqueduct and DC WASA as needed.

During calendar year 2005, Region III continued to assist the Aqueduct and DC WASA in their research efforts on elevated levels of lead in drinking water. EPA assisted DC WASA and the Aqueduct by developing and distributing outreach materials on this subject. EPA also performed a sanitary survey of the water distribution system and conducted a thorough evaluation of disinfection operations at the two treatment plants. EPA also assisted in the review of the District's Consumer Confidence Report (CCR), which was delivered in June 2005. Region III worked with the Navy's water systems to revise their sampling plans for coliform bacteria and lead and copper. Region III also worked with the Aqueduct, DC WASA, and the Virginia customers concerning water system security issues. EPA has provided funding to these water

systems to evaluate their security procedures, refine their emergency operation plans, and to upgrade their cyber security systems.

Additional information about the PWSS Program in the District, or extra copies of this report may be obtained by contacting:

Karen D. Johnson, Chief
Ground Water and Enforcement Branch (3WP22)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029
Telephone: (215) 814-5445
FAX: (215) 814-2302
E-mail: johnson.karend@epa.gov

Copies of the Annual Compliance Reports for Public Water Systems in the District of Columbia may also be found on the web at:

<http://www.epa.gov/reg3wapd/drinkingwater/DCdrinking/index.htm>

Appendix A: Calendar Year 2005 Violation Summary for the District of Columbia

Contaminant or rule	Violation Type											
	MCLs			Monitoring			Treatment Technique			Consumer Notification		
	# of viols ^a	# of RTC viols ^b	# of PWS in viol ^c	# of viols	# of RTC viols	# of PWS in viol	# of viols	# of RTC viols	# of PWS in viol	# of viols	# of RTC viols	# of PWS in viol
IOC	0	0	0	0	0	0						
RAD	0	0	0	0	0	0						
SOC	0	0	0	1 ^d	1	1						
VOC	0	0	0	0	0	0						
TCR	0	0	0	0	0	0						
LCR				0	0	0	1	1	1			
SWTR				0	0	0	0	0	0			
DBP	0	0	0	2 ^e	2	1	0	0	0			
CCR											1	1
PN											0	0
Grand totals:	0	0	0	3	3	2	1	1	1	1	1	1

A shaded box indicates that the violation type is not applicable to a contaminant or rule. 0

Notes:

a: “# of viols” refers to the number of violations of a specific type for each rule during calendar year 2005

b: “# of RTC viols” refers to the number of violations that have been returned to compliance

c: “# of PWS in viol” refers to the number of public water systems in the District of Columbia which had a specific type of violation for a given rule during calendar year 2005

d: The monitoring violation for the SOC glyphosate occurred in 2003, but was discovered during 2005. Please see the narrative for additional details.

e: The DBP monitoring violations occurred in 2004, but were discovered during 2005. Please see the narrative for additional details.

Details by PWS ID

PWS ID	DC0000001				
System name	Washington Aqueduct Division				
Population	0				
	Contaminant	Violation type (SDWIS code)	Compliance period begin date	Compliance period end date	Violation ID
2034	SOC (Glyphosate)	M/R (3)	7/1/2003	9/30/2003	0300003

PWS ID	DC0000002				
System name	District of Columbia Water and Sewer Authority				
Population	595,000				
	Contaminant	Violation type (SDWIS code)	Compliance period begin date	Compliance period end date	Violation ID
2950	DBP (TTHM)	M/R (27)	10/1/2004	12/31/2004	0500017
2456	DBP (HAA5)	M/R (27)	10/1/2004	12/31/2004	0500016
5000	LCR (LSLR)	TT (64)	10/1/2004	9/30/2005	#0600019
7000	CCR	M/R (71)	7/1/2005	7/11/2005	0500015

Totals for calendar year 2005

Total number of regulated systems	6
Total number of systems with violations	2
Total number of violations	5

Definitions

Violation type definitions

Violation: A failure to meet any state or federal drinking water regulation.

MCL: Maximum Contaminant Level – The highest amount of a contaminant that EPA allows in drinking water. MCLs ensure that drinking water does not pose either a short-term or long-term health risk.

Monitoring: EPA specifies which water testing methods the water systems must use, and sets schedules for the frequency of testing. A water system that does not follow EPA's schedule or methodology is in violation [40 CFR 141]. States must report monitoring violations that are significant as determined by the EPA Administrator and in consultation with the States.

Treatment Technique: A required process intended to reduce the level of a contaminant in drinking water

Consumer Notification: A required process for providing information to customers of a public water system

SDWIS Code: Specific numeric codes from the Safe Drinking Water Information System (SDWIS) have been assigned to each violation type included in this report. The violations to be reported include exceeding contaminant MCLs, failure to comply with treatment requirements, and failure to meet monitoring and reporting requirements. Four-digit SDWIS Contaminant Codes have also been included in the chart for specific contaminants.

Contaminant or rule definitions

CCR: Consumer Confidence Report – The annual report on water quality which must be distributed to customers of a community water system. SDWIS Violation Code 71 indicates a failure to provide this report.

DBP: Disinfection Byproduct – Two groups of disinfection byproducts are regulated by EPA. SDWIS Violation Code 27 indicates a monitoring violation.

TTHM: Total Trihalomethanes – SDWIS Contaminant Code 2950 is the sum of four (4) regulated trihalomethane species.

HAA5: Haloacetic Acids (sum of 5) – SDWIS Contaminant Code 2456 is the sum of five (5) regulated haloacetic acids.

IOC: Inorganic Contaminant - Non-carbon-based compounds such as metals, nitrates, and asbestos. These contaminants are naturally-occurring in some water, but can get into water through farming, chemical manufacturing, and other human activities. EPA has established MCLs for 15 inorganic contaminants [40 CFR 141.62].

LCR: Lead and Copper Rule - This rule established national limits on lead and copper in drinking water [40 CFR 141.80-91]. Lead and copper corrosion pose various health risks when ingested at any level, and can enter drinking water from household pipes and plumbing fixtures. States report violations of the Lead and Copper Rule in the following categories:

Initial lead and copper tap M/R: SDWIS Violation Code 51 indicates that a system did not meet initial lead and copper testing requirements, or failed to report the results of those tests to the State.

Follow-up or routine lead and copper tap M/R: SDWIS Violation Code 52 indicates that a system did not meet follow-up or routine lead and copper tap testing requirements, or failed to report the results.

Treatment installation: SDWIS Violation Codes 58 AND 62 indicate a failure to install optimal corrosion control treatment system (58) or source water treatment system (62) which would reduce lead and copper levels in water at the tap. [One number is to be reported for the sum of violations in these two categories].

Public education: SDWIS Violation Code 65 shows that a system did not provide required public education about reducing or avoiding lead intake from water.

LSLR: Lead Service Line Replacement – SDWIS Violation Code 64 indicates that a system required to replace lead service lines did not meet the lead service line replacement requirements of the Lead and Copper Rule.

PN: Public Notification - Notification that water systems must provide to their customers upon discovering any violation of a contaminant standard.

RAD: Radionuclides - Radioactive particles which can occur naturally in water or result from human activity. EPA has set legal limits on the following types of radionuclides: radium-226, radium-228, uranium, gross alpha, and beta particle/photon radioactivity [40 CFR 141.66]. Violations for these contaminants are to be reported using the following categories:

Gross alpha: SDWIS Contaminant Code 4000 for alpha radiation above MCL of 15 picocuries/liter (pCi/L). Gross alpha includes radium-226 but excludes radon and uranium.

Combined radium-226 and radium-228: SDWIS Contaminant Code 4010 for combined radiation from these two isotopes above MCL of 5 pCi/L.

Uranium: SDWIS Contaminant Code 4006 for uranium levels above MCL of 30 micrograms per liter ($\mu\text{g/L}$).

Gross beta: SDWIS Contaminant Code 4101 for beta particle and photon radioactivity from man-made radionuclides above 4 millirem/year.

SOC or VOC: Synthetic Organic Contaminant or Volatile Organic Contaminant - Organic contaminants are carbon-based compounds, such as industrial solvents and pesticides. These contaminants generally get into water through runoff from cropland or discharge from factories. EPA has set legal limits on 54 organic contaminants that are to be reported [40 CFR 141.61].

SWTR: Surface Water Treatment Rule - Establishes criteria under which water systems supplied by surface water sources, or ground water sources under the direct influence of surface water, must filter and disinfect their water [40 CFR 141, Subpart H]. Violations of the Surface Water Treatment Rule are to be reported for the following categories:

Monitoring, routine/repeat (for filtered systems): SDWIS Violation Code 36 indicates a system's failure to carry out required tests, or to report the results of those tests.

Treatment techniques (for filtered systems): SDWIS Violation Code 41 shows a system's failure to properly treat its water.

Monitoring, routine/repeat (for unfiltered systems): SDWIS Violation Code 31 indicates a system's failure to carry out required water tests, or to report the results of those tests.

Failure to filter (for unfiltered systems): SDWIS Violation Code 42 shows a system's failure to properly treat its water. Data for this violation code will be supplied to the States by EPA.

TCR: Total Coliform Rule - Establishes regulations for microbiological contaminants in drinking water. These contaminants can cause short-term health problems. If no samples are collected during the one month compliance period, a significant monitoring violation occurs. States are to report the following categories of violations:

Acute MCL violation: SDWIS Violation Code 21 indicates that the system found fecal coliform or *E. coli*, potentially harmful bacteria, in its water, thereby violating the rule.

Non-acute MCL violation: SDWIS Violation Code 22 indicates that the system found total coliform in samples of its water at a frequency or at a level that violates the rule. For systems collecting fewer than 40 samples per month, more than one positive sample for total coliform is a violation. For systems collecting 40 or more samples per month, more than 5% of the samples positive for total coliform is a violation.

Major routine and follow-up monitoring: SDWIS Violation Codes 23 AND 25 show that a system did not perform any monitoring. [One number is to be reported for the sum of violations in these two categories.]

Sanitary Survey: SDWIS Violation Code 28 indicates a major monitoring violation if a system fails to collect 5 routine monthly samples if sanitary survey is not performed.

**Appendix B: Status of Requirements in the Administrative Order for Compliance on Consent (June 17, 2004)
and the Supplemental Administrative Order for Compliance on Consent (January 14, 2005)
Issued by EPA Region III to the District of Columbia Water and Sewer Authority**

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
June 10, 2004 ¹	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4) AO PP 68	Received 6/10 and reviewed using SOP
<i>July 1, 2004</i>	<i>Submit to EPA a plan for conducting sampling including address, criteria if location is changed, etc.</i>	<i>AO PP 75</i>	Plan dated June 25, 2004 EPA comments July 14, 2004 Revised plan dated 24 Nov.
July 12, 2004 ²	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), <i>AO PP 68</i>	Received and reviewed
July 12, 2004	Report for tap water samples for lead and copper due (within first 10 days following end of each applicable monitoring period, which ended June 30, 2004). Report shall include any data collected in addition to the data required by 40 C.F.R. §§ 141.80-.91.	40 C.F.R. 141.90(a)(1); 141.90(g).	Received and reviewed

¹Normal font: regulatory requirement Italics: AO requirement Teal: Plan-developed milestone. Brown italics: supplemental order requirement.

²Where date in regulation falls on a weekend, this calendar is adjusted to designate the first business day thereafter.

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
July 17, 2004	<i>Submit for review and approval a plan to obtain follow-up sampling of partial replacement lead service lines. Sampling within 72 hours. Within 90 days of EPA approval implement the plan to re-sample the service lines partially replaced since July 1, 2002 and no sample to date.</i>	40 C.F. R. 141.84 (d) and AO PP#67 & 69 (needs to be calculated once plan is approved)	Plan dated July 19, 2004 EPA comments August 10, 2004 Revised plan August 20, 2004 Revised plan approved; letter dated Dec 6, 2004.
July 17, 2004	<i>Submit to EPA for review and comment a public education plan regarding system-wide and specific issues implementing the recommendations in the EPA May 6,2004, report on PE effectiveness.</i>	AO PP # 70, Attachment A	Received plan dated July 19, 2004 EPA comments August 2, 2004 No approval process in AO
July 17, 2004	<i>Submit documentation that point of use devices were supplied to lead service locations and any that exceed action level on second draw and plan for providing replacement filters on an appropriate schedule.</i>	AO PP #84	Plan dated 7/19/ 2004 EPA comments 8/2/ 2004 WASA reply to comments 8/20/2004 EPA plan approval 9/3/2004
July 17, 2004	<i>Submit to EPA for approval a plan and schedule for continuing filter distribution program and providing replacements.</i>	AO PP 84	Received plan July 19, 2004 EPA comments 8/2/2004 WASA reply 8/20/2004 EPA plan approval 9/3/2004

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
August 2, 2004	Submit to EPA for approval a plan and schedule for updating the materials evaluation used for sampling and its inventory of lead service lines (initial update of Lead service lines due by Sept 1, 2004)	Requirement of AO PP #63	Received plan August 2, 2004 EPA comments August 13, 2004 WASA reply Sept 7, 2004 EPA plan approval 9/29/04
August 2, 2004	Submit a plan so that 1000 of the lines replaced between Oct 1, 2004 and September 30, 2006 will be DOH priority locations (no matter whether < AL).	AO PP# 81 AO PP # 82	Received plan August 2, 2004 EPA comments August 10, 2004 WASA reply August 30, 2004 EPA plan approval 9/29/04
August 2, 2004	Submit a plan for review and approval to encourage homeowners to consent to full replacement of service lines	AO PP# 83	Received plan August 2, 2004 EPA approval August 10, 2004
August 10, 2004	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), AO PP #68	Received and reviewed
August 16, 2004	Submit to EPA for comment a plan for enhanced database management and reporting All reporting to meet criteria in PP #77	AO PP# 76 & 77	Received plan August 16, 2004 EPA comments Sept 3, 2004
September 1, 2004	Initial update of lead service line inventory due with requirement for annual update each Sept 1.	AO #63	Received inventory update Sept 1, 2004

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
September 10, 2004	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), <i>AO PP #68</i>	Received and reviewed
September 30, 2004	<p>Complete the following public education activities:</p> <ol style="list-style-type: none"> 1. Information inserted with bills; special alert language on the face of the water bill 2. Submit public education materials to editorial departments of the major daily and weekly newspapers circulated throughout the community. 3. Deliver public education materials to facilities and organizations. 4. Submit a public service announcement to at least 5 of the radio and television stations with the largest audiences that broadcast to the community served by the water system. 	<p>40 C.F.R. 141.85. Based on extensions previously granted, the six-month period for public education requirements ends March 31; the twelve-month period ends September 30.</p> <p>DCWASA shall use the language required by 40 C.F.R. § 141.85. Any omissions from the mandatory language shall be approved in advance by EPA. EPA shall be given a reasonable opportunity to review and comment upon any information provided in addition to the mandatory language.</p> <p><i>AO PP#72</i></p>	<p>Received report dated October 6, 2004</p> <p>Report reviewed and found to be in compliance with regulatory requirements. Review did not include assessment of effectiveness per public education plan (paragraph #70)</p>

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
September 30, 2004	Complete replacement of at least 7% (1615) of the initial number of lead service lines in the distribution system between September 30, 2003 and September 30, 2004. All replacements will be physical replacements, not "test outs"	40 C.F.R. 141.84(b). Based on extensions previously granted, the 12 month period for lead service line replacement ends September 30 of each year. <i>AO PP#80</i>	Received report dated September 30, 2004. Revised report dated 6 December 2004
September 30, 2004	Annual Report due for lead line replacements and recalculation of the 7% based on the updated inventory of service lines.	40 C.F.R. 141.90(e)(2) <i>AO PP #64 & 65</i>	Received report dated September 30, 2004.
<i>October 1, 2004- Sept 30, 2006</i>	<i>Replace additional 1,615 lead service lines for the missed year 2000-2001. All replacements will be physical replacements, not "test outs"</i> Field determinations of 1, 200 'unknown' service lines. Updates to CIS based on no-digs, test pits, LSLRs.	<i>AO PP #66</i> <i>AO PP#80</i> Inventory Plan (AO PP 63)	808 Additional lines scheduled for 2005 replacement year per revised language sent as an attachment to a Dec 6 letter from J Dunn.
October 11, 2004	Report for public education requirements due (within 10 days after the end of each period in which the system is required to perform public education tasks in accordance with 40 C.F.R. 141.85(c)).	40 C.F.R. 141.90(f). Based on extensions previously granted, the six-month period for public education requirements ends March 31; the twelve-month period ends September 30. <i>AO PP #72</i>	Report dated October 6, 2004

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
October 11, 2004	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), <i>AO PP #68</i>	Report dated Oct 7, 2004
November 10, 2004	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), <i>AO PP #68</i>	Report, undated, in early Nov
(November 24, 2004)	First Quarterly Report for Inventory plan	Inventory Plan (AO PP63)	Received quarterly report on status of inventory update.
December 1, 2004	WASA completes CIS upgrade pursuant to Inventory plan	AO PP 63, Inventory Plan	Quarterly report of 24 Nov indicated that modification will be completed on schedule and available for data entry by Dec 1.
December 10, 2004	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), <i>AO PP #68</i>	Received report 10 December 04.

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
January 3, 2005	<p>Submit to EPA a plan for conducting sampling including address, criteria if location is changed, etc.</p> <p>Report of the current list of addresses for routine monitoring to confirm service line material from main to property line and property line to residence. (Material Evaluation)</p>	<p>AO PP 75</p> <p>Inventory Plan (AO PP 63)</p>	Received plan on 11/24/04; Received update on 1/10/05
January 10, 2005	Report for tap water samples for lead and copper due (within first 10 days following end of each applicable monitoring period, which ended December 31, 2004). Report shall include any data collected in addition to the data required by 40 C.F.R. §§ 141.80-.91.	40 C.F.R. 141.90(a)(1); 141.90(g)	Received 1/10/05
January 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), AO PP #68	Received 1/10/05
February 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), AO PP #68	Received 2/10/05 monthly and cumulative
February 14, 2005	Submit a determination of the number of LSL reported as "passed" in the Sept 30, 2003 Report, and which lines were sampled using the five-minute methodology.	AO2 PP 13	Received

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
<i>February 14, 2005</i>	<i>Submit documentation demonstrating which, if any, LSLs identified pursuant to PP 13 have been physically replaced</i>	<i>AO2 pp 14</i>	Received
<i>February 14, 2005</i>	<i>Submit for review and approval a draft notice to customers whose LSLs were "passed" using 5-minute methodology</i>	<i>AO2 pp 16</i>	Received. Notice approved letter 24 Feb.
March 1, 2005	2nd quarterly report for Inventory Plan. WASA will update the June 01 Baseline Inventory with re-categorized 'unknowns'.	AO PP 63	Received March 1, 2005 All backlog data entered by March 1.
March 6, 2005	WASA will compare list of customers who received lead line replacements but did not return the post-partial sampling kit with the list of customers who requested and conducted sampling this year.	Plan approved Dec 6 pursuant to AO PP 67 for post partial LSLR sampling	No independent report of this item required.
March 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), AO PP #68	Report dated March 9, 2005

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
March 31, 2005	Submit a public service announcement to at least five of the radio and television stations with the largest audiences that broadcast to the community served by the water system.	<p>40 C.F.R. 141.85(c)(3). Based on extensions previously granted, the six-month period for public education requirements ends March 31; the twelve-month period ends September 30. <i>AO PP #72</i></p> <p>DCWASA shall use the language required by 40 C.F.R. § 141.85. Any omissions from the mandatory language shall be approved in advance by EPA. EPA shall be given a reasonable opportunity to review and comment upon any information provided in addition to the mandatory language. <i>AO PP #71</i></p>	Submitted. See report
April 6, 2005	WASA to send letters to 'catch up' customers for post-LSLR sampling with test kits	Plan approved Dec 6 pursuant to AO PP 67 for post partial LSLR sampling	WASA indicated through phone conversation that task completed. Will be part of LSLR monthly sampling reports.

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
April 7, 2005	<i>One year mark for filter distribution program. Must continue until 2 consecutive 6-mo monitoring periods are below AL. [Submit to EPA for approval a plan and schedule for continuing filter distribution program and providing replacements.]</i>	AO PP 84	No submittal required. Filter distribution continues as of April 7, 2005.
April 11, 2005	Report for public education requirements due (within 10 days after the end of each period in which the system is required to perform public education tasks in accordance with 40 C.F.R. 141.85(c))	40 C.F.R. 141.90(f). Based on extensions previously granted, the six-month period for public education requirements ends March 31; the twelve-month period ends September 30. AO PP #72	Report received dated April 8, 2008
April 11, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), AO PP #68	Report dated April 8, 2005
<i>May 3, 2005 (was March 18, 2005, approx 21 days after approval of notice)</i>	<i>WASA shall send notice described in pp 16 to customers or provide documentation to EPA that line was retested, replaced, or copper.</i>	<i>AO2 pp 18 * AO modification signed on June 9, 2005</i>	WASA verbally reported that letters were sent.

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
May 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1).	141.90(e)(4), <i>AO PP #68</i>	Report dated May 10, 2005
June 1, 2005	3 rd quarter report for Inventory Plan	<i>AO pp 63</i>	Report dated 7 June 05
June 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1). <i>Report to include results of post LSLR sampling plan/successes of catch up.</i>	141.90(e)(4), <i>AO PP #68</i>	Report dated 9 June 05
July 1, 2005	<i>Submit to EPA a plan for conducting sampling including address, criteria if location is changed, etc.</i>	<i>AO PP 75</i>	Report submitted electronically on 6/24/05 and followed with hard copy by mail
July 11, 2005	Report for tap water samples for lead and copper due (within first 10 days following end of each applicable monitoring period, which ended June 30, 2004). Report shall include any data collected in addition to the data required by 40 C.F.R. §§ 141.80-.91.	40 C.F.R. 141.90(a)(1); 141.90(g)	Report submitted electronically on 6/24/05 and followed with hard copy by mail

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
July 11, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1). Report to include results of post LSLR sampling plan/successes of catch up.	141.90(e)(4), AO PP #68	Report dated July 8, 2005
August 1, 2005	WASA to complete statistical correlation of determiners of service line material	Inventory Plan (AO PP 63)	Letter dated August 1, 2005
August 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines. Report to include results of post LSLR sampling plan/successes of catch up.	141.90(e)(4), AO PP #68	Letter dated August 10, 2005
September 1, 2005	Submit a plan to resolve remaining unknown services. (Sept 7, 2004 letter)	Inventory Plan (AO PP 63)	Submitted September 1, 2005
September 12, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1). Report to include results of post LSLR sampling plan/successes of catch up.	141.90(e)(4), AO PP #68	Report dated 9 Sept. Includes information about catch up locations and waiver locations.

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
<p>September 30, 2005</p>	<p>Complete the following public education activities:</p> <ol style="list-style-type: none"> 1. Information inserted with bills; special alert language on the face of the water bill 2. Submit public education materials to editorial departments of the major daily and weekly newspapers circulated throughout the community. 3. Deliver public education materials to facilities and organizations. 4. Submit a public service announcement to at least 5 of the radio and television stations with the largest audiences that broadcast to the community served by the water system. 	<p>40 C.F.R. 141.85. Based on extensions previously granted, the six-month period for public education requirements ends March 31; the twelve-month period ends September 30</p> <p>DCWASA shall use the language required by 40 C.F.R. § 141.85. Any omissions from the mandatory language shall be approved in advance by EPA. EPA shall be given a reasonable opportunity to review and comment upon any information provided in addition to the mandatory language.</p> <p><i>AO PP #71, 72</i></p>	<p>Activities reported in annual report dated October 6, 2005.</p>
<p>September 30, 2005</p>	<p>Complete replacement of at least 7% of the initial number of lead service lines in the distribution system between September 30, 2004 and September 30, 2005. <i>All replacements will be physical replacements, not "test outs"</i></p>	<p>40 C.F.R. 141.84(b). Based on extensions previously granted, the 12 month period for lead service line replacement ends September 30 of each year.</p> <p><i>AO PP #80</i></p>	<p>Completed</p>

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
September 30, 2005	Annual Report due for lead line replacements. <i>Report should include identification subset of service lines replaced as DOH priority.</i> Report should include a breakdown of responses to various options to encourage full line replacement and possible analysis of success of each option.	40 C.F.R. 141.90(e)(2) AO PP 81, 82 AO PP 83, EPA Aug 10 letter	Report dated September 28, 2005. Addendum to report dated November 18, 2005. Status report on full service line replacement program dated December 18, 2005.
<i>September 30, 2005 and every September 30 thereafter until Pb90 < AL</i>	<i>Submit for EPA review and approval a calendar for the next 12 month for reporting compliance, similar to Appendix B</i>	AO PP # 73	Submitted September 23, 2005 Approval letter sent November 8, 2005.
October 10, 2005	Report for public education requirements due (within 10 days after the end of each period in which the system is required to perform public education tasks in accordance with 40 C.F.R. 141.85(c)).	40 C.F.R. 141.90(f). Based on extensions previously granted, the six-month period for public education requirements ends March 31; the twelve-month period ends September 30.	Report dated October 3, 2005
October 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1). Report to include results of post LSLR sampling plan/successes of catch up.	141.90(e)(4) , AO PP #68	Report dated October 6, 2005

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
November 10, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1). <i>Report to include results of post LSLR sampling plan/successes of catch up.</i>	141.90(e)(4), AO PP #68	Report dated November 10, 2005
December 12, 2005	Report all sampling results received during the prior month for sampling conducted following partial replacement of lead service lines pursuant to 40 C.F.R. § 141.84(d)(1). <i>Report to include results of post LSLR sampling plan/successes of catch up.</i>	141.90(e)(4), AO PP #68	Report dated December 9, 2005
January 10, 2006	Report for tap water samples for lead and copper due (within first 10 days following end of each applicable monitoring period, which ended December 31, 2005). Report shall include any data collected in addition to the data required by 40 C.F.R. §§ 141.80-.91.	40 C.F.R. 141.90(a)(1); 141.90(g)	Report submitted electronically on 01/03/06 Revised reports were sent 1/31/06, 4/25/06 and 5/3/06.
<i>September 30, 2006</i>	Annual Report due for lead line replacements. <i>Report should include identification subset of service lines replaced as DOH priority.</i> WASA was asked to resubmit a list of all 1000 priority locations as part of this report.	40 C.F.R. 141.90(e)(2) AO PP 81, 82	Received (dated October 2, 2006); under review. Covers October 1, 2005 - December 31, 2005. WASA is no longer required to report LSL replacements after achieving two consecutive 6-month monitoring periods under the lead action level.

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
<i>September 30, 2007.</i>	<i>Physically replace the number of LSLs equal to the number calculated in PP 13 minus the number of LSLs in PP 14</i>	<i>AO2 PP 15</i>	<i>Report dated September 28, 2005 includes sufficient number of LSL replacements to meet requirements of AOA2 pp 15.</i>