

US EPA ARCHIVE DOCUMENT

2004-2005 CALENDAR FOR REPORTING COMPLIANCE WITH 40 CFR §§ 141.80(C), 141.84 & 141.85

<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 type: 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 w/in 72 hours. Within in 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 ltr 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 to lead service locations and any that exceed action level on second draw and 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

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August 2, 2004	<i>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</i>	<i>Requirement of AO PP #63</i>	Received plan August 2, 2004 EPA comments August 13, 2004 WASA reply Sept 7, 2004 EPA plan approval 9/29/04
August 2, 2004	<i>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).</i>	<i>AO PP# 81 AO PP # 82</i>	Received plan August 2, 2004 EPA comments August 10, 2004 WASA reply August 30, 2004 EPA plan approval 9/29/04
August 2, 2004	<i>Submit a plan for review and approval to encourage homeowners to consent to full replacement of service lines</i>	<i>AO PP# 83</i>	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), <i>AO PP #68</i>	Received and reviewed
August 16, 2004	<i>Submit to EPA for comment a plan for enhanced data base management and reporting All reporting to meet criteria in PP #77</i>	<i>AO PP# 76 & 77</i>	Received plan August 16, 2004 EPA comments Sept 3, 2004

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
<i>September 1, 2004</i>	<i>Initial update of lead service line inventory due with requirement for annual update each Sept 1.</i>	<i>AO #63</i>	Received inventory update Sept 1, 2004
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), AO PP #68	Received and reviewed

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
<p>September 30, 2004</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#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>

DATE	REGULATORY/AO REQUIREMENT	COMMENTS	STATUS
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.
October 1, 2004- Sept 30, 2006	Replace additional 1,615 lead service lines for the missed year 2000-2001. All replacements will be physical replacements, not "test outs" 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 (PP63)	808 Additional lines scheduled for 2005 replacement year per revised language sent as an attachment to a Dec 6 ltr 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),AO PP #68	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),AO PP #68	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), AO PP #68	Rec'd report 10 December 04.

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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 PP63)</p>	Rec'd plan on 11/24/04; rec'd 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)	Rec'd 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	Rec'd 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

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<i>February 14, 2005</i>	<i>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.</i>	<i>AO2 PP 13</i>	received
<i>February 14, 2005</i>	<i>Submit documentation demonstrating which, if any, LSL's identified pursuant to PP 13 have been physically replaced</i>	<i>AO2 pp 14</i>	received
<i>Februray 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'.	<i>AO PP 63</i>	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), <i>AO PP #68</i>	report dated March 9, 2005

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<p>March 31, 2005</p>	<p>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>	<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>	<p>submitted. See report</p>
<p>April 6, 2005</p>	<p>WASA to send letters to ‘catch up’ customers for post- LSLR sampling with test kits</p>	<p>Plan approved Dec 6 pursuant to AO PP 67 for post partial LSLR sampling</p>	<p>WASA indicated through phone conversation that task completed. Will be part of LSLR monthly sampling reports.</p>

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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>	<i>AO PP 84</i>	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. <i>AO PP #72</i>	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), <i>AO PP #68</i>	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</i> <i>* AO modification signed on June 9, 2005</i>	WASA verbally reported that letters were sent.

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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
<i>July 1, 2005</i>	<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

DATE	REGULATORY/AO REQUIREMENT	COMMENTS	STATUS
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 ltr)	Inventory Plan (AP 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.

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September 30, 2005	<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>	Activities reported in annual report dated October 6, 2005.

<u>DATE</u>	<u>REGULATORY/AO REQUIREMENT</u>	<u>COMMENTS</u>	<u>STATUS</u>
September 30, 2005	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. 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. AO PP #80	completed
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 AP PP 83, EPA Aug 10 ltr	Report dated September 28, 2005. Addendum to report dated November 18, 2005. Status report on full service line replacement program dated December 18, 2005.
September 30, 2005 and every September 30 thereafter until Pb90 < AL	Submit for EPA review and approval a calendar for the next 12 month for reporting compliance, similar to Appendix B	AO PP # 73	Submitted September 23, 2005 Approval letter sent November 8, 2005.

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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) , <i>AO PP #68</i>	report dated October 6, 2005
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). Report to include results of post LSLR sampling plan/successes of catch up.	141.90(e)(4), <i>AO PP #68</i>	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). Report to include results of post LSLR sampling plan/successes of catch up.	141.90(e)(4), <i>AO PP #68</i>	Report dated December 9, 2005

DATE	REGULATORY/AO REQUIREMENT	COMMENTS	STATUS
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>	<i>Annual Report due for lead line replacements. Report should include identification subset of service lines replaced as DOH priority.</i>	<i>40 C.F.R. 141.90(e)(2) AO PP 81, 82</i>	<i>Report dated October 2, 2006; report indicates that priority locations were reported on separately</i>
<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>

