

Deck 1

Slide 14 (Voiceover) and elsewhere – Be clear when you are talking about a drinking water treatment plant vs a wastewater treatment plant. Both have NPDES permits but the sole purpose of a POTW is to discharge treated wastewater while at a drinking water treatment plant the NPDES is due to discharges incidental to the drinking water treatment process (e.g., clarification basin washdown, on-line instrument pass through, etc.)

Slide 17 (Voiceover) – SDWA empowers EPA to set standards that require treatment to meet or set treatment requirements when a specific standard (an MCL) cannot be set. Treatment is not limited to filtration and disinfection (e.g., ion exchange, reverse osmosis, etc.)

Slide 18 (Voiceover) – Not clear why refers to “integrity of drinking water distribution system”

Refers to Bioterrorism Act. Since submittal the original vulnerability assessments have been returned to drinking water systems or destroyed. However, in October 2018, America’s Water Infrastructure Act (S3021) was signed into law and it requires a new round of risk assessments (more extensive than previous round – encompassing natural hazards, cybersecurity, fiscal and infrastructure risks) and emergency response plans, which are updated periodically. The system submits a certification to EPA that it has met this obligation rather than submit the assessment for review.

Slide 19 (Voiceover) – UIC is beyond the scope of what most water systems deal with unless they are trying to discharge a brine from treatment or treated water for storage in aquifer storage and recovery (which is not itself regulated through UIC but for which policy is informed by UIC).

Slide 21 – Suggest you use a different correct answer. In practice, SDWA does very little to protect source water used for drinking water and the relevant program, UIC, is not frequently relevant for the webcast audience.

Slide 22 (Voiceover) – Does not address timely and accurate reporting. Slide 23 does not address routine reporting

Deck 2

Slide 10 (Voiceover) – Compliance reporting is not limited to monthly reports under SDWA.

Slides 11 and 12 – Slides are duplicates

Slide 13 (Voiceover) – Requirements under SDWA are not “best practices” they are minimum requirements

Slide 14 (Voiceover) – Public health impacts should be identified first then enforcement risks.

Test questions -- Several of the test questions are not covered in the slides or voiceover

Deck 3

Nothing

Deck 4

Slide 7 (Voiceover) – “compliance and risk inventory” is not a typical phrase. What most folks have is (1) standard operating procedures for maintaining adequate control and steps to take when control is lost and (2) when external drivers endanger or overwhelm operations then the emergency response plan will guide response

Slide 9 (Voiceover) – “So, it would be nice if your compliance and risk inventory was focused exclusively on current laws and regulations – and overwhelmingly it is.” Regulatory compliance is the minimum level of performance that is acceptable. Risk begins to accrue when operations are not performing at optimal.

“emerging contaminants” “mega trend” “effective environmental stewardship” – Our focus is on public health, that requires being forward looking. Current text is not consistent with overall frame of training which is rudimentary compliance.

Slide 10 (Voiceover) – “management of change” “This may be a straightforward one-page check list to assess the new inputs” There are entire manuals of practice around individual facets of drinking water treatment. Under SDWA, changes in treatment require permit modifications that have to be approved. Our typical advice w/r/t investment in significant change in treatment or practice is to get your information organized and talk through with regulator before acting.

Slide 11 [current slide 10 in Storyline] (and Voiceover) – EMS is not a part of the day-to-day lingo of the water sector. Rather, sector tries to reach treatment objectives and service delivery targets at sustainable rates and addresses regulatory compliance as it impinges on or guides reaching those objectives. If this content is retained more effort will need to go into building out the concept

Test questions -- Several of the test questions are not covered in the slides or voiceover