

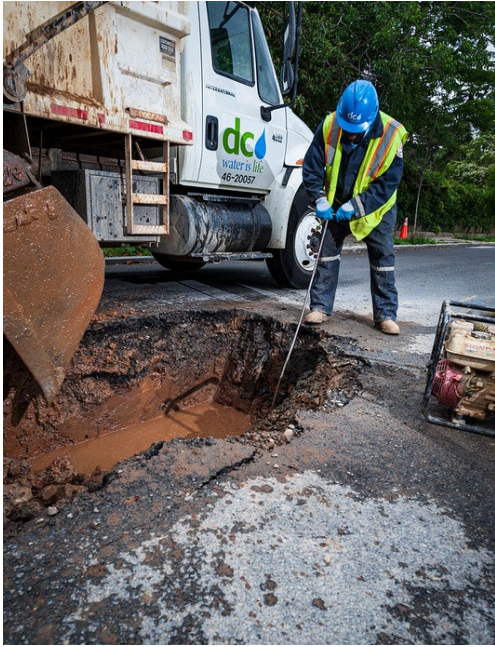


# District of Columbia Direct Implementation

# District of Columbia Direct Implementation (DCDI)

- Of the 56 states and territories, all except Wyoming and the District of Columbia have primacy for drinking water
  - EPA Region III has direct oversight of the public drinking water systems in the District of Columbia
- DCDI responsibilities include:
    - Compliance determinations
    - Response to drinking water emergencies
    - Sanitary surveys (on-site reviews)
    - Technical assistance
    - Issue notices of non-compliance (violations)
      - [ECAD: NOV/AOC/AO]
    - Electronic data management
    - Workshops/exercises for water systems

# District of Columbia Direct Implementation




- Principal systems in the District of Columbia:
  - **Washington Aqueduct**, Division of the U.S. Army Corps of Engineers, treats the water served to the District
  - District of Columbia Water and Sewer Authority (**DC Water**), buys water from the Aqueduct then distributes and sells water to approx 633,000 DC customers
- 3 consecutive systems purchase water from DC Water:
  - **Joint Base Anacostia-Bolling**: 19,312 customers
  - **Washington Navy Yard**: 15,690 customers
  - **U.S. Naval Observatory**: 250 customers
- Total DC population served by all systems: ~665,000 customers\*
  - \*The Aqueduct also sells water to Arlington County and Fairfax Water (Virginia, regulated by VDH) for a total population served ~1 million customers.



# Emergency Notification to EPA Direct Implementation Team

1 hour (preferred) but no later than 24 hours:

- Waterborne disease outbreak or other emergency that affects water leaving the treatment plants and has significant potential to cause serious adverse effects on human health as a result of short-term exposure, such as but not limited to:
  - Natural and man-made disasters that disrupt the treatment plants, source waters or transmission mains;
  - Chemical spill of any type in proximity to the source waters, treatment plant intakes or transmission mains;
  - A situation that causes a loss of positive pressure to any portion of the distribution system;
  - Presence of carcass in finished water storage facility;
  - A lack of resources that adversely affects operations, such as staff shortages, contractor issues, notification by the power utility of planned lengthy power outages, or imminent depletion of treatment chemical inventories.

 <span style="float: right;">Jan 2023</span>	
<b>Notification Guide for Washington Aqueduct Division</b>	
<p>This guide is intended for the Washington Aqueduct public water system in the District of Columbia. It provides a quick reference for water system personnel on information that should be verbally reported to EPA Region 3 promptly after the violation or situation has occurred. For further information, please refer to the annual guidance provided by EPA Region 3.</p>	
<p>Please post this in a conspicuous location as a reminder of when to report to EPA Region 3's Drinking Water Program. Please Contact:</p>	
<b>Always Report as Soon as Practical, but No Later Than:</b>	<b>Emergency and Other General Situations</b> <small>(Use line numbers on right hand side for easy reference)</small>
<b>EPA preference is for 1 Hour reporting but in no case later than 24 Hours After:</b>	<p>Occurrence of a waterborne disease outbreak or other emergency situation that affects water leaving the treatment plants and has significant potential to cause serious adverse effects on human health as a result of short-term exposure, such as but not limited to:</p> <ul style="list-style-type: none"> <li>• Natural and man-made disasters that disrupt the treatment plants, source waters or transmission mains;</li> <li>• Chemical spill of any type in proximity to the source waters, treatment plant intakes or transmission mains;</li> <li>• A situation that causes a loss of positive pressure to any portion of the distribution system;</li> <li>• Presence of carcass in finished water storage facility;</li> <li>• A lack of resources that adversely affects operations, such as staff shortages, contractor issues, notification by the power utility of planned lengthy power outages, or imminent depletion of treatment chemical inventories. (1)(R)</li> </ul> <p>Other violations/situations with significant potential for serious adverse human health effects from short-term exposure such as chemical overfeed. (2)(R)</p>
<b>48 Hours After:</b>	<p>Failure to comply with any National Primary Drinking Water Regulation, <i>including the failure to monitor</i>. Shorter time frames for others rules (See below). (3)(R)</p> <p>An anticipated change to monitoring requirements, either an increase or a reduction. (4)(G)</p> <p>Failure to take corrective action for a significant deficiency within the required time frame. (5)(R)</p>
<b>Before Intended:</b>	<p>An anticipated change to treatment, either an increase or a reduction. (6)(R)</p>
<b>Chemical Monitoring</b>	
<b>24 Hours After:</b>	<p>Exceedance of the maximum contaminant level (MCL), based on a running annual average (RAA) for any of the chemicals required to be monitored. (7)(R)</p> <p>Exceedance of the nitrate MCL of 10 mg/L, or the nitrite MCL of 1 mg/L, or the total nitrate/nitrite MCL of 10 mg/L. (8)(R)</p> <p>Failure to collect confirmation samples within 24 hours of notification of first sample results. (9)(R)</p>
<b>Disinfectants and Disinfection By-Products</b>	
<b>24 Hours After:</b>	<p>If the entry point chlorine residual is less than 0.2 mg/L. (10)(R)</p>
<b>48 Hours After:</b>	<p>Failure to meet the RAA for total organic carbon (TOC) removal ratio of at least 1.0. (11)(R)</p> <p>Exceedance of maximum residual disinfectant level (MRDL) for chlorine residual of 4.0 mg/L as an annual average. (12)(R)</p>
<b>Surface Water Treatment</b>	
<b>24 Hours After:</b>	<p>If at any time the combined filter effluent turbidity is:</p> <ul style="list-style-type: none"> <li>• Greater than 1.0 NTU (R); or</li> <li>• Greater than 0.3 NTU in at least 95 percent of the readings (every 4 hours) taken each month (G).</li> </ul> <p>If any 2 consecutive individual filter effluent turbidity readings taken every 15 minutes are:</p> <ul style="list-style-type: none"> <li>• Greater than 1.0 NTU(G); or</li> <li>• Greater than 0.5 NTU after the first 4 hours of operation after backwash or offline. (G) (13)</li> </ul>
<b>Lead and Copper</b>	
<b>Before Intended:</b>	<p>Any planned change in corrosion control treatment. (14)(R)</p>
<b>48 Hours After:</b>	<p>Determining that Water Quality Parameters (WQPs) have fallen outside the parameters set for optimized corrosion control. (15)(G)</p>
<b>Filter Backwash Recycling</b>	
<b>24 Hours After:</b>	<p>Significant findings (tears, holes, or other failures) during visual inspection of the silt curtain. (16)(G)</p> <p>Receiving routine monthly monitoring test results showing elevated turbidity readings or other abnormality that indicates the alternate backwash location is potentially affecting the treatment process. (17)(G)</p>
<p>(R) designates National Primary Drinking Water Regulation requirements. (G) designates EPA Region 3 Guidance.</p>	

## Emergency Communication to EPA Direct Implementation Team

- Each public water system receives an emergency communication procedure updated as needed
- Water system must speak to a person directly, messages are not considered valid communication
- Communication starts with DCDI team leader
  - Escalates to through drinking water management chain
- Notification is for *finished water* issues
  - Separate communication contacts and procedures for:
    - Contamination or spill events that impact Potomac River
    - Water security issues

### Examples of Emergencies:

- Chemical overfeeds
- Turbidity excursions
- Water main breaks
- E.coli –positive results
- MCL exceedance

These do NOT report directly through the DCDI team leader as the first point of contact.

If you have any questions about our DI authorities, please contact:  
Alysa Zirilli, P.G.  
[zirilli.alysa@epa.gov](mailto:zirilli.alysa@epa.gov)

# How does EPA' s drinking water program receive notifications?

Contamination or spill events that impact Potomac River

- ICPRB notifications
- Hot site reports (internal at EPA) sharing NRC reports

Water security issues

- MWCOG RICCS notifications
- States / Utilities
- EPA CID / FBI / CISA

**POC: Patti Kay Wisniewski, 215.514.7893 [Wisniewski.patti-kay@epa.gov](mailto:Wisniewski.patti-kay@epa.gov)**

# Region 3 EPA's Drinking Water Program Roles

- Oversight of State Drinking Water Programs
- Drinking Water Subject Matter Experts
  - Able to provide technical expertise/assistance
  - Reach back to others (ORD, WICRD, Laboratory, ATSDR)
- Coordination is **key** on Potomac River (Federal, State, local and WARN partner resources)
- Utilities work locally first, when city/county and state resources exhausted, Federal resources can be requested



Stay in your lane



# Region 3 EPA's Drinking Water Program more Roles



- Water Support Team for field deployments
  - Region 3 maintains a Mission Essential Water Team to provide volunteer responders to assist in the assessment of damaged DW/WW systems.
- Sampling Team for finished DW regulated parameters; *potential* for analysis via Regional laboratory

