



# Frequently Asked Questions

---

## Stage 2 D/DBPR Operational Evaluation Level

Christine Kirkendoll, D/DBPR Technical Support Engineer

4/27/2012

## **Frequently Asked Questions about the Stage 2 D/DBPR: Operational Evaluation Level (OEL)**

### **Q: What is an Operational Evaluation Level (OEL) exceedance?**

A: You have exceeded the OEL at any monitoring site where the sum of the two previous quarters' TTHM results plus twice the current quarter's TTHM result, divided by four, exceeds 80 ppb, or where the sum of the two previous quarters' HAA5 results plus twice the current quarters' HAA5 result, divided by four, exceeds 60 ppb (CFR 141.626 (a))

### **Q: How and when will I be notified of an OEL exceedance?**

A: You will be notified by certified mail. The notification will be mailed with the analytical results that cause the exceedance.

### **Q: Is an OEL exceedance a violation?**

A: No, if you exceed the OEL, you must conduct an operational evaluation and submit a written report of the evaluation to the State no later than 90 days after being notified of the analytical result that causes you to exceed the OEL. (CFR 141.626 (b)(1))

### **Q: Do I have to notify the public of an OEL exceedance?**

A: No, but a copy of the evaluation report must be maintained on file and made available to the public upon request. (CFR 141.626 (b)(1))

### **Q: What is the deadline for submitting the OEL evaluation report?**

A: You must submit a written report of the evaluation to the State no later than 90 days after being notified of the analytical results that cause you to exceed the OEL. (CFR 141.626 (b)(1))

### **Q: What will happen if I do not submit the report by the deadline or submit a report that does not contain all the required information?**

A: If a report containing all the required information is not submitted to the State by the 90 day deadline a monitoring and reporting violation will be issued. Each report will be reviewed to determine if all of the required information is included. The water system will be notified of any missing required information. The water system will continue to receive a monitoring and reporting violation each month until all of the required information is included in the report.

### **Q: What must be included in an operational evaluation?**

A: Your operational evaluation must include an examination of system treatment and distribution operational practices, including storage tank operations, excess storage capacity, distribution system flushing, changes in source or source water quality, and treatment changes or problems that may contribute to TTHM and HAA5 formation and what steps could be considered to minimize future exceedances. (CFR 141.626 (b)(2))

**Q: How do I request a limited scope evaluation?**

A: If the cause of the OEL exceedance can be identified the system may request to limit the scope of their evaluation. The request can be made by contacting the D/DBPR Technical Support Engineer, Christine Kirkendoll, by phone, fax, email, or mail. If the State decides to allow you to limit the scope of your evaluation you will receive the approval in writing indicating the new required evaluation elements. The written approval must be maintained on file with the completed report. (CFR 141.626 (b)(2)(i, ii))

**Q: What is the deadline for requesting a limited scope evaluation?**

A: The State recommends that systems make requests at least 45 days prior to the deadline for submitting the written report of the evaluation. Every request will be reviewed individually.

**Q: Do I have to use the operational evaluation forms or questionnaires developed by the ADH for my OEL evaluation report?**

A: The questionnaires and forms are not a required part of the evaluation report. They are provided to assist water system personnel with the evaluation. The questionnaires and forms may be included with the report to provide the required supporting documentation. The summary page provided with the exceedance notification needs to be attached to the evaluation report submitted to the State.

**Q: If a wholesaler supplies water exceeding the MCL for DBPs to a consecutive system's master meter does that consecutive system have to conduct an operational evaluation for an OEL exceedance which occurs in the consecutive system?**

A: Yes, the consecutive system will be required to conduct an operational evaluation. The system may request to limit the scope of the evaluation. Every request to limit the scope will be reviewed individually. Consecutive systems may include information provided by their wholesalers in the evaluation report.

**Q: If a consecutive system does not treat their water do they have to request a limited scope evaluation to limit the evaluation to source water quality and distribution system practices only?**

A: No, a request to limit the scope will not be required. The system may simply state in the report that treatment is not applicable. Consecutive systems may include treatment information provided by their wholesalers in the evaluation report.

**Q: Can consecutive systems use information from their wholesalers in their OEL evaluations?**

A: Yes, consecutive systems may include information provided by their wholesalers in the evaluation report.

**Q: If I have multiple sources do I have to evaluate every source?**

A: The system may request to limit the scope of evaluation to a particular source, treatment plant, or section of the distribution system if the system can provide evidence that the service area where the exceedance occurred was not affected by the other sources, plants, or sections of distribution system directly or indirectly. Every request to limit the scope will be reviewed individually.

**Q: Most OEL exceedances will occur in the July/Aug. /Sept. quarter because of the hot weather. If a system exceeds the OEL in the July/Aug. /Sept. quarter will that system have to conduct a full OEL evaluation?**

A: Systems affected by this scenario will be divided into three categories.

Category 1: The system has documentation of the DBP levels at the site where the exceedance occurred prior to their Stage 2 D/DBPR compliance start date and can identify the cause of the OEL exceedance. The system may request to limit the scope of evaluation. Every request to limit the scope will be reviewed individually.

Category 2: The system had an OEL exceedance which occurred at the same location as a previous monitoring period for which a cause has been identified but the solution has not yet been implemented or is in progress. The system may request to limit the scope of evaluation. Every request to limit the scope will be reviewed individually.

Category 3: The system does not meet the criteria in the other two categories. The system will need to conduct a full evaluation the first year the OEL exceedance occurs to identify all possible contributing factors. After the first evaluation the State will review requests to limit the scope of the evaluation for OEL exceedances which occur at the same location as a previous monitoring period for which a cause has been identified but the solution has not yet been implemented or is in progress. Every request to limit the scope will be reviewed individually.

**Q: Can I change my DBP monitoring plan?**

A: Yes, if a monitoring site is not representative of the service area the system may request to change the site. Examples of sites that are not representative of the service area are taps with service lines which require more than 5 minutes to flush, tank side taps, or the last service connection on a dead end line. The request can be made by contacting Christine Kirkendoll by phone, fax, email, or mail. If the State decides to allow the site to be replaced a new monitoring plan will be created and mailed to the system. The new monitoring plan must be maintained on file.