



Meeting Notes  
Drinking Water Advisory Group  
December 2, 2024

Agenda Item	Notes
<p><b>2. ODW Updates</b> Holly Myers, Office Director</p>	<ul style="list-style-type: none"> <li>◆ Working hard to meet EPA’s expectations.</li> <li>◆ Working on an Interagency agreement (similar to a Memorandum of Understanding) with the Squaxin Island Tribe.</li> <li>◆ Using Alternative Water Funding to help us meet the nitrate remediation needs in the Lower Yakima Valley.</li> <li>◆ Legislative Session is coming up soon.</li> <li>◆ Working on Safe Drinking Water Information System (SDWIS), which will be our new data system. EPA and many other states use the program. It will make reporting to EPA easier and quicker.</li> <li>◆ Working to standardize processes across the state between our offices</li> <li>◆ Several job openings are posted now.               <ul style="list-style-type: none"> <li>○ Brad’s position in Policy and Planning Section: <a href="#">Environmental Planner (EP4) DOH8482   Apply tab   Career Pages</a></li> <li>○ Chris’ position in the State Revolving Fund: <a href="#">Technical Assistance Program Coordinator (PHA3) DOH8505   Apply tab   Career Pages</a></li> </ul> </li> </ul> <p><b>Q: (Kit, AKA William Burns) Are there reporting rules for private companies? A:</b> Water systems are considered public water systems in this state, even if you are privately owned. They would be the same, however they are owned. Depending on ownership, the owner itself may be under the UTC.</p> <p><b>Q: Grace Gottlieb) Will the new portal centralize all compliance reporting from all water systems, including self-reporting and lab reporting, etc.? Also, when will it launch? A:</b> The public won’t be able to add things to it, but will be able to view it. The plan is to have it up and running in mid-year 2025. We will test it and teach our staff before putting it out there and then will help the public learn it too.</p>
<p><b>3. Final Legislative Proposals Update</b> Brad Burnham, Policy and Planning Section Manager</p>	<ul style="list-style-type: none"> <li>◆ Legislative Session starts on January 13, and it is a long session, it ends on April 27 (105 days long). This will include the crafting of the budget.</li> <li>◆ This month we should start seeing pre-filed bills where someone files a bill before the Session starts. As of today, there are no pre-filed bills.</li> <li>◆ Biggest change for this year is the new governor. It’s been 12 years since we had a change. Will be getting a budget from the new governor.</li> <li>◆ They’re forecasting that we could have a \$10-12 billion shortfall over the next 4 years.</li> <li>◆ Several hot topics are ones that we are following and doing work on, including:               <ul style="list-style-type: none"> <li>○ PFAS.</li> <li>○ Climate Resiliency, a group we are working with: <a href="#">Water   Climate Impacts Group.</a></li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>○ Fusion Energy.</li> <li>○ Housing.</li> </ul> <p>◆ We don't have any bills in right now, but we have some ongoing work in the budget requests.</p> <p><b>Questions</b></p> <p><b>Q: (John W.) is Water Use Efficiency and water conservation one of your Hot Topic areas based on the Performance Audit? A:</b> We are acting on this and working with the Ruckelshaus Center.</p> <p><b>Q: (Kit) What are we doing to address PFAS in Washington? A:</b> Ecology is also working on this and has a website.</p>
<p><b>4. Manganese ODW Outreach</b> Mike Means, Capacity Development and Policy Manager</p>	<ul style="list-style-type: none"> <li>◆ We have always had manganese as a secondary contaminant.</li> <li>◆ EPA has a lifetime health advisory, but no primary contaminant right now.</li> <li>◆ We want to be clear that manganese is not a health risk, but it is, and we are reaching out to the 46 systems that are above the EPA's lifetime health advisory.</li> <li>◆ This is a new thing, so we are just starting to reach out to those 46 systems.</li> </ul> <p><b>Questions</b></p> <p><b>Q: (Tammy) What was the level of manganese? A:</b> (Answered by Charese Gainor): 0.05 mg/L is the value in the publication, with a goal to treat down to 0.02 mg/L, per: <a href="#">331-741 - Manganese in Drinking Water: Recommendations for Public Water System Managers</a>. (Answered by Andy Anderson): 0.3 mg/L is EPA's lifetime Health Advisory Level (HAL). (1) Applies to short-term consumption (10 days) for infants less than 6 months old. (2) Applies to lifetime consumption for general population. ODW recommends that water systems issue public notice to users when manganese level in drinking water is above this level.</p>
<p><b><a href="#">5. Memorandum of Understanding with Ecology Update</a></b> John Freitag, Policy Planning Lead</p>	<ul style="list-style-type: none"> <li>◆ It's a bi-lateral agreement between Ecology and DOH that covers planning and engineering documents.</li> <li>◆ It is not meant to create any new policy, and it is different than Ecology's Municipal Water Law Policy update.</li> <li>◆ It was last updated in 2007.</li> <li>◆ Most of the public will not notice any changes as most of them were about our internal processes.</li> <li>◆ Next steps will be to support the staff in both agencies to implement the agreement.</li> <li>◆ Links from John.             <ul style="list-style-type: none"> <li>○ Cover Letter: <a href="#">ECY-DOH-MOU-CoverLetter.pdf</a>.</li> <li>○ MOU: <a href="#">ECY-DOH-MOU-Signed.pdf</a>.</li> </ul> </li> </ul>



- Joint Review Procedures: [Joint Review Procedures: Procedures for Planning and Engineering Documents.](#)
- ◆ From Holly: Please look over the documents John shared. The documents go into more detail on individual responsibilities and identify these shared responsibilities for DOH/ECY:
  1. Interagency Coordination Liaison: Each agency will designate an interagency coordination liaison. The liaisons will coordinate on any emerging statewide water resources issue affecting water systems and assist with consistency and coordination between regions in implementation. The liaisons will act as the subject matter experts regarding this MOU for their agency. The liaisons will also coordinate joint procedures, outreach, training, and attend coordination meetings.
  2. Coordination Meetings: The agencies will consult at a minimum semi-annually at the regional office level to:
    - Coordinate water system planning and watershed planning to identify if additional coordination is needed.
    - Review a list of water systems required to update their water system plan in the coming year and new water system plans compiled by DOH, including those closely tied to grant and loan applications at the coordination meeting; and
    - Ecology will help identify water system plans of interest for close coordination during the comment process.
    - Identify or coordinate training on topics such as the Municipal Water Law, water rights, and water system planning.

### Questions

**Q: (Adam Gravley): What is meant by "policy" or "new policy"? Is there an example of what would be included or excluded? A:** [Policies | Washington State Department of Health.](#)

**Q: (John Roth): For Ecology and water systems to interact, would that be considered Technical Assistance? Would we work with Commerce too on things like the growth management? A:** (John Freitag) Not sure if they would call it Technical Assistance, but John can include a link for Ecology. John has asked Austin Melcher to put together a one-pager that will talk about what they consider the water rights reviews would be whether it is Technical Assistance or not. As for the second question, we will talk more about it. Good to bring that up routinely. I meet frequently with commerce's Chris McChord.

**Q: (Dan): Does the policy included water quality issues? A:** The MOU doesn't cover what we do with Ecology on water quality. We do have a different policy that will allow us to ask Ecology to expedite a review of a water right if there are water quality issues.



**Q: (Perry Lovelace) For Island County, a sole source aquifer, the relationship between water rights granted and the measured extraction rate through Water Use Efficiency reports requires essential coordination between DOE and DOH. Hope your progress reflects that. A:** This is one of the things that came up in our audit and we are working on it.

**Q: (Ava Mitten): Are there any improvements/required testing improvements being implemented to test public school drinking water(for lead, copper, PFAS, and harmful bacteria)? (I am a college student involved in a HEAL externship) to try and learn about drinking water policy and ways to get my high school Coupeville High school clean drinking water). A:** (Perry Lovelace): Ava, I am working on the sustainability of our Whidbey water supply. I would be glad to help you if you contact me. [Perry.lovelace@gmail.com](mailto:Perry.lovelace@gmail.com). ODW: we also have a HEAL group here and can help out.

**Q: (Perry Lovelace) Who have you reached out to at Ecology? A:** (Deborah Johnson, ODW) In order to be designated as an SSA, someone must have applied to EPA & provided technical info to back that. Do you know what was prepared for that endeavor and who was involved?

**SSA: Whidbey Island Aquifer Area SSA; Region 10; Jeff Brittain [brittain.jeffrey@epa.gov](mailto:brittain.jeffrey@epa.gov), 206-553-0532, Water Division, Oregon Operations Office | Suite 500**

**6. Same Farm Exemption Policy Update**  
John Freitag, Policy Planning Lead and Brad Burnham, Policy and Planning Section Manager

- ◆ Working on getting this ready to send it forward.
- ◆ This is something that came down from EPA in a request to see what water is being served and is focused on the Lower Yakima Valley.
- ◆ Link to ODW policy webpage with information about the policy, link to old policy, link to draft policy that public commented on. And, we will post the revised policy on this page when it is complete and associated documents: [Policies | Washington State Department of Health](#)
- ◆ The public comment period is closed but this link above has the draft policy.
- ◆ This is something that we weren't planning to work on right now, but we wanted to make sure that our policies were clear and that all people were receiving safe and reliable drinking water.

**Questions**

**Q: (Noe Vargas Fuentes) My county has received a few applications for H2A housing, which I am still fairly unfamiliar with. Does this policy apply to those applications? A:** (Holly) The same farm exemption does not override the permitting process for H2A or farmworker housing. Temporary Worker Housing permitting for DOH: [Juan.gamezbrecino@doh.wa.gov](mailto:Juan.gamezbrecino@doh.wa.gov). (Mike Means) Most of those applications would be going thru Ecology. Many of the H2A may not be Group A water systems.

**Q: (Rick Dawson) When finalized will a new set of forms etc. be available? A:** Yes, if anything needs to be revised, we will update any forms and post them on our website.



	<p><b>Q: (Gregory Bunce) Earlier in the meeting someone mentioned the documentary, "Sludge: A PFAS Uprising". Is there a place/source where we have access to watch that? I can't seem to find it online. A: (Kit) I saw Sludge at a film festival. I think you'll have to scour the web to find it. If they are available on-line, support them and buy the DVD.</b></p>
<p><b>7. PFAS MCL Communication Tools and Development Needs</b> Mike Means, Capacity Development and Policy Manager and Claire Nitsche, Health Educator</p>	<ul style="list-style-type: none"> <li>◆ Ecology published a statewide funding strategy to address PFAS in the next four years. As you may know, the legislature asked Dept of Ecology, in consultation with Dept of Health, to develop a funding strategy.             <ul style="list-style-type: none"> <li>○ <a href="#">PFAS Statewide Funding Strategy: Four-Year Plan for Prevention, Reduction, and Mitigation in Washington State</a></li> </ul> </li> <li>◆ If you want to know more about PFAS: <a href="#">PFAS Basics 1: What are PFAS?</a></li> <li>◆ Link to our YouTube page with the PFAS videos is at: <a href="#">PFAS   Washington State Department of Health</a>.</li> <li>◆ We also have publications and the links will be sent out later today.             <ul style="list-style-type: none"> <li>○ <a href="#">PFAS Monitoring Follow-Up Chart 331-668 (PDF)</a>.</li> <li>○ <a href="#">PFAS Tools and Resources (PDF)</a>.</li> </ul> </li> <li>◆ The most concerning sensitive population we talk about are pregnant women, babies that are breastfeeding, and children under six years old.</li> </ul> <p><b>Questions</b></p> <p><b>Q: (Meade Brown Jr) Are water systems required to report PFAS on their Consumer Confidence Report? A: Yes, due to it being a state requirement</b></p> <p><b>Q: (Heidi Stephens) Even if PFAS may eventually leave the body, aren't they also called "forever chemicals" because they essentially never breakdown in nature? A: Yes, correct. That is why we emphasize that cleanup is so important, as well as limiting use of products that contain PFAS to help keep them out of the environment. <a href="#">PFAS in Drinking Water—Monitoring and Analysis webpage</a>.</b></p> <p><b>Q: (Elaine Packard) How often is the testing? Every three years doesn't sound very good as a consumer. A: Every three years is only if your initial one showed as non-detect. It is more often if you do have a detection. You would also have to do public notification. <a href="#">PFAS Monitoring Follow-Up Chart 331-668 (PDF)</a>.</b></p> <p><b>Q: (Grace Gottlieb) If there's an approved well, that currently is under 'active' status on DOH but the well has not been put in service (nor anytime soon we plan to use that well), do we still have to do the testing that well according to the WQMS? A: It would be best to talk to your regional office staff. They can help you with the status of the well.</b></p> <p><b>Q: (Derek Pell) Have we had success working with health care providers sharing messages with the more vulnerable populations? A: We are still working on this. One of the challenges we are up against is the lack of recommendations from CDC and the US Preventative Task Force.</b></p>



**Q: (Dan) I wonder if bottled water is tested for PFAS? A:** Currently bottled water does not require PFAS testing, but some are testing and marking their labels.

**Q: (John Roth) Do you know if they test pre or post bottling? Do they have testing standards? A:** Some advertise that they do test, but we don't know for sure if they do any testing. Bottled Water is under Department of Agriculture.

**Q: (Holly Myers) Someone brought up Glide floss earlier, do we have a place to check on what products have it? A:** Check with [Consumer Confidence Reports](#) or another website.

**Q: (Mikahala Waters) Does Washington have any plans for remediations right now? A:** For water systems, the carbon granulator is most right now. There are a few other ways that are approved, but not used right now in our state.

**Q: (Wesley Loven) Is there any traction for mandatory PFAS testing for Group B water systems in Washington state? A:** Not right now as there would be a lot of systems that would need to be tested, and we would need the LHJs to be a part of it too.

**Q: (Heidi Stephens) Don't the actual plastic bottles, themselves, leach PFAS into water? A:** (Grace Gottlieb) To Claire: [Plastic particles in bottled water | National Institutes of Health \(NIH\)](#). (Claire's response): I have seen this. Because PFAS aren't technically microplastics, this hasn't been part of my work, but it is on my radar. (Kit) phalates come from the bottles and are endocrine disrupter.

**[8. Groundwater Recharge Risks](#)**

Deborah Johnson,  
Wellhead Protection  
Program Coordinator  
and Mike Means,  
Capacity Development  
and Policy Manager

- ◆ There are many ways that land can be contaminated and move into wellhead protection areas.
- ◆ We are working with Ecology about their policies and rules to update them with working to keep the wellhead protection areas clean.
- ◆ (Lara Koger): Underground Injection Control (UIC) wells are regulated under Ecology—water quality is *required* to be addressed in the engineering and design of these. (James Hay): Rule authorized UICs can definitely be a water quality concern where they are not prohibited in CARAs.

**Questions**

**Q: (Noe Vargas Fuentes) Can you share your thoughts on paved roads as a potential contamination (specifically those with ditches on the sides)? I get this question a lot at well sites, generally we go off the well log to determine concern A:** This was in the chat and was never answered. Contact [Deborah Johnson](#).

**Q: (Heidi Stephens) Asking for the state to do more oversight, especially with some of the cities. A:** This is outside of what we can do, but we are working directly with some cities to make them aware of things they can do to help and they need



	<p><b>Q: (Kit) On the UIC, he is working on a project and is wondering who decides the Wellhead Protection Area and who regulates it? A:</b> The system decides several of the items themselves. Please reach out to <a href="#">Deborah Johnson</a> if you have more questions and want to talk more about your concerns.</p>
<p><b><a href="#">9. Lead and Copper Rule Improvement Review and Discussion</a></b> Matt Hadorn, Water Quality Emerging Contaminants Lead and Brad Burnham, Policy and Planning Section Manager</p>	<ul style="list-style-type: none"> <li>◆ Reminder: Make sure you send in your Lead Service Line Inventories.</li> <li>◆ The Lead and Copper Rule Improvement has recently come out from EPA, but we've been more focused on the Lead Service Line Inventories.</li> <li>◆ We will have more info on this and what all of it means for systems and what the dates are for which items.</li> <li>◆ There is a lower Lead action level as it went from 0.015 mg/L to 0.010 mg/L, but this doesn't take effect until November 1, 2027.</li> <li>◆ <a href="#">Lead Survey Line Inventory Frequently Asked Question 331-712 (PDF)</a></li> <li>◆ Systems must still comply with the pre-July 2021 Lead and Copper Rule requirements until November 1, 2027, with a few exceptions, mainly the initial lead service line inventories that were due on October 16, 2024.</li> </ul> <p><b>Questions</b></p> <p><b>Q: (Lynn Kirby) What level of effort is expected to identify lead connectors when there are no records available? A:</b> (Holly) Here's a link. <a href="#">Lead Service Line Inventory Guidance 331-711 (PDF)</a></p> <p><b>Q: (Mike Shane) Can you clarify the specifics of validation required related to non-lead service line material? A:</b> This was in the chat. Contact <a href="#">Matt Hadorn</a>.</p> <p><b>Q: (Carol Stuckey) If a water system treats for corrosion control due to Copper exceedances only, does the re-optimizing that you discussed apply to that system? A:</b> This was in the chat. Contact <a href="#">Matt Hadorn</a>.</p> <p><b>Q: (John Roth) Holly I thought I had read that there were differences in LCRR &amp; LCRI specifically about lead connectors and "service line validation." It appears that maybe the current references were developed for LCRR, are they good to for LCRI too? A:</b> We will share improvements prior to 11/1/2027. We will continue updates at this meeting.</p> <p><b>Q: (Doug Greenlund) Guidance for LCRI includes premise plumbing in Tier 1 criteria. Where are water systems expected to know premise plumbing materials? A:</b> This was in the chat. Contact <a href="#">Matt Hadorn</a>.</p>
<p><b>5. Agenda Ideas for next Meeting</b> John Freitag, Policy Planning Lead</p>	<ul style="list-style-type: none"> <li>◆ We went long, please e-mail ideas to <a href="#">Brad Burnham</a>.</li> </ul>