



STATE OF IDAHO

DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway, Coeur d'Alene, ID 83814 (208) 769-1422

C. L. "Butch" Otter, Governor
Curt Fransen, Director

February 7, 2014

Dave Banks
Carlin Bay Property Owners Association
13675 Edgewater Road
Harrison, ID 83833
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Subject: 2014 – 2016 Drinking Water Monitoring Requirement and Waiver Evaluation

The Safe Drinking Water Act requires all public water systems to conduct monitoring for Inorganic Contaminants (IOCs), Synthetic Organic Contaminants (SOCs), and Volatile Organic Contaminants (VOCs).

Idaho allows reduction in the repeat monitoring frequency for certain inorganic and organic chemical contaminants through monitoring waivers because of the low potential for occurrence of contamination in public water systems. All community and non-community non-transient water systems may apply for a monitoring waiver.

Enclosed is the drinking water monitoring waiver evaluation for your water system for the 2014 through 2016 monitoring period. Waivers have been granted based on completed monitoring and low vulnerability to chemical contamination. You may go to the following website to obtain your most updated monitoring schedule:

http://www.deq.idaho.gov/Applications/SDWISReports/pws_index.cfm

If you have any questions regarding the monitoring process, the waiver decisions, or any enclosed information that is not consistent with your records, please call me at (208) 666-4624.

Sincerely,

A handwritten signature in blue ink that reads "Suzanne Scheidt".

Suzanne Scheidt

Analyst

Suzanne.Scheidt@deq.idaho.gov

Enclosure

c: Anna Moody, IDEQ CRO anna.moody@deq.idaho.gov
File in TRIM: ID1280039 Carlin Bay Property Owners Association

Drinking Water Monitoring Waiver Evaluation

PWS 7 Digit Number: ID1280039	PWS Name: CARLIN BAY PROPERTY OWNERS ASSN	Source Name: LAKE CDA	☐ GW ☒ SW/GWUDI
Eligibility requirements: Application is complete and signed? Return materials to agent of PWS to be resubmitted. Drinking water fees are current? Waivers are denied if fees are 180 days or more delinquent)			☒ Yes ☐ No ☒ Yes ☐ No
A. IOCs (excluding nitrate, nitrite, and sodium) 40 CFR 141.23(c)			
1. Were the most recent IOC monitoring requirements met? Verify in SDWIS that sources without previous waivers (i.e. new sources) have three rounds of monitoring. This means that ground water systems must have one sample for three consecutive three-year monitoring periods although three annual rounds are acceptable. Surface water sources must have three annual rounds. Systems with unresolved failure to monitor violations for the most recent monitoring period and for the analytes being reviewed are not eligible for waivers.			☒ Yes ☐ No
2. Are the results reliably and consistently below the MCL? Verify in SDWIS that the results do not show an upward trend, wide variability, or are near or at the MCL. If no, that analyte is not eligible for a waiver.			☒ Yes ☐ No
3. Are there any changes to the pumping rates, system configuration, or operating procedures? Review answer to question 2.e. on the application. If the answer is yes, review the source's monitoring history and source water assessment to determine if there may be a likelihood of contaminant intrusion such as in areas impacted by arsenic. Answering "yes" does not mean the waiver should be denied but further review may be necessary.			☐ Yes ☒ No
4. For community public water systems seeking a waiver from fluoride monitoring, is the source influenced by geothermal water or is there a known history of fluoride above the secondary MCL of 2 mg/L? Review the answer to question 2.d. on the application. If yes, the source may not be eligible for a monitoring waiver. Review the fluoride monitoring results in SDWIS.			☐ Yes ☒ No
IOC waiver granted? Not applicable. PWS currently operating under nine year monitoring waiver issued in 2011. One round of monitoring for IOCs is required between January 1, 2011 and December 31, 2019. ☒ Yes for all. ☐ No for all. One sample is required for ground water sources during the three year compliance period or annual samples are required for surface water sources. ☐ Partial: The following IOCs are NOT waived and must be monitored quarterly if over the MCL, annually for surface water sources, or once during the three year compliance period for ground water sources. ☐ Arsenic, ☐ Antimony ☐ Barium, ☐ Beryllium, ☐ Cadmium, ☐ Chromium, ☐ Mercury, ☐ Nickel, ☐ Selenium, ☐ Thallium, ☐ Fluoride for community public water systems			
B. IOC: Asbestos 40 CFR 141.23(b)			
1. Does the system use any unlined asbestos-cement pipe in the distribution system? See the answer for question 2.c. on the application. If yes, the system does not qualify for a reduction in monitoring and must sample during the first three year compliance period of a nine year compliance cycle (i.e. 2011-2013) from a tap served by the asbestos-cement pipe. Review previous sanitary surveys if the answer is unknown.			☐ Yes ☒ No
2. Is the source vulnerable to asbestos? (Check http://www.idahogeology.org) Review answer for question 2.c. on the application. If a system is vulnerable to source contamination from naturally occurring asbestos deposits (rare in Idaho) or from dumping of asbestos materials in a water shed for a surface water source, the system is not eligible for a waiver and source monitoring is required during the first three year compliance period of a nine year compliance cycle (i.e. 2011-2013). Most systems should be eligible for source asbestos waivers.			☐ Yes ☒ No
IOC Asbestos waiver granted? ☒ Yes. No monitoring is required during the nine year compliance cycle. ☐ No.			
C. IOC: Cyanide 40 CFR 141.23 (a)			
1. Is the source vulnerable to cyanide contamination? Review the answer question 2.a. on the application, the source water assessment, and previous sanitary surveys to determine if there are potential sources of cyanide. Review SDWIS for detections of cyanide. Idaho has very few sources of cyanide that impact drinking water. If there are questions, collaborate with the Department's ground water or surface water program to evaluate further.			☐ Yes ☒ No
Cyanide waiver granted? ☒ Yes. No monitoring is required during the nine year compliance cycle. PWS received nine year waiver in 2011. Cyanide is waived through 2019. ☐ No. Monitoring is required from the source: ☐ quarterly if over the MCL or detections warrant, ☐ annually for surface water sources, or ☐ during the three year compliance period for ground water sources.			
C. VOC Group 40 CFR 141.24 (f)			

1. Were the most recent VOC monitoring requirements met and with no detections? Review monitoring history in SDWIS. Detections are any result over 0.0005 mg/L. New sources must have completed initial monitoring of four quarterly samples with no detections to qualify. Systems with unresolved failure to monitor violations for the most recent monitoring period and for the analytes being reviewed are not eligible for waivers. Systems with previous detections must have taken the required quarterly samples then have three consecutive annual VOC samples with no detections.	☒ Yes ☐ No
2. Did the system apply for a USE waiver and a USE waiver is appropriate for this source? No VOCs are or were <u>used, manufactured, transported, stored, or disposed of</u> in the watershed for surface water or zone of contribution for ground water (see the source water assessment). If use of VOCs is unknown, suspected, or VOCs were or are used, a USE waiver is not applicable and a SUSCEPTIBILITY waiver may be applicable.	☐ Yes ☒ No ☐ Unknown
3. Is a SUSCEPTIBILITY waiver appropriate for this source? Review the most recent sanitary survey, the source water assessment, and evaluate the answers provided on the application regarding land use. Identify any potential sources of VOCs. If sources of VOCs are identified or probable, review the fate and transport of the chemicals in question. Ensure that ground water sources are properly constructed with good topsoil and flood protection. Ensure there are no significant deficiencies that may cause the source to be vulnerable to VOC contamination (construction and condition of the well). Granting a susceptibility waiver using the criteria outlined in the waiver guidance is considered an approved vulnerability assessment.	☒ Yes ☐ No
Identify whether the system has an active and certified source water protection plan (see answer to question 2.b. on the application). An answer of no does not preclude a VOC waiver but may help if vulnerability is in question.	
VOC group waiver granted? PWS operating was operating under three year waiver issued in 2012. Three year waiver renewed for the 2014-2016 monitoring period. ☒ Yes. For ground water, one sample is required every ☐ three years or every ☐ six years (most common). For surface water, ☐ one sample is required or ☒ no sample is required (most common) every three years. ☐ No. Monitoring is required from the source: ☐ quarterly if there are detections over 0.0005 mg/L or ☐ annually.	
D. SOC and SOC: Dioxin 40 CFR 141.24 (h)	
1. Were the most recent SOC monitoring requirements met and with no detections? Review monitoring history in SDWIS. Detection limits for SOC are listed in 40 CFR 141.24(h)(18). Systems with unresolved failure to monitor violations for the most recent monitoring period and for the analytes being reviewed are not eligible for waivers. For new sources, quarterly monitoring is completed or can be partially waived if there are two full group SOC samples (except Dioxin) in the past two years with no detections and the source applies for a USE or a SUSCEPTIBILITY waiver.	☒ Yes ☐ No
2. Did the system apply for a USE waiver and a USE waiver is appropriate for this source? No SOC are or were <u>used, manufactured, transported, stored, or disposed of</u> in the watershed for surface water or zone of contribution for ground water (see the source water assessment). The use of SOC is difficult to determine for more urban areas. If use of SOC is unknown, suspected, or SOC are or were used, a USE waiver is not be applicable but a SUSCEPTIBILITY waiver may be applicable.	☐ Yes ☒ No ☐ Unknown
3. Is a SUSCEPTIBILITY waiver appropriate for this source? Use the same criteria listed for VOCs in C.3. above to determine if a SUSCEPTIBILITY waiver is appropriate. Additionally, review nitrate results for this source. Elevated nitrate results may indicate the source could be susceptible to SOC.	☒ Yes ☐ No
SOC waiver granted? ☐ Yes. No samples are required during the three year compliance period. ☒ Yes for Dioxin. No samples are required during the three year compliance period for Dioxin. (Most PWSs should receive a waiver) ☒ No or Partial. The checked analytes are NOT waived and are to be monitored as outlined (normally SOC are waived in groups and by analytical methods): Q – quarterly if detected and not reliably and consistently below the MCL; A – annually if detected but reliably and consistently below the MCL; T – two quarterly samples within one year of each three year monitoring period for systems serving over 3,300 people and no detections; or O – one sample every three year monitoring period for systems serving 3,300 and under and with no detections.	☐ <i>EDB, DBCP</i> ☐ Q ☐ A ☐ T ☐ O ☐ <i>Endothall</i> ☐ Q ☐ A ☐ T ☐ O ☐ <i>Diquat</i> ☐ Q ☐ A ☐ T ☐ O ☐ <i>Glyphosate</i> ☐ Q ☐ A ☐ T ☐ O ☐ Carbamates: <i>Carbofuran, Oxamyl</i> ☐ Q ☐ A ☐ T ☐ O ☒ Herbicides: ☐ Q ☒ A ☐ T ☐ O 2,4-D ☐ Semi-Volatiles: <i>Endrin, Lindane, Methoxychlor, Toxaphene, Di (2-ethylhexyl) adipate, Simazine, Hexachloro-cyclopentadiene, Atrazine, Alachlor, Heptachlor, Heptachlor epoxide, Hexachlorobenzene, Benzo[a]pyrene, PCBs, Chlordane</i> ☐ Phthalate: <i>Di(2-ethylhexyl) phthalate</i> ☐ Dioxin
Signature of approving authority: _____ Date: January 31, 2013	Signature of reviewer: _____ Date: January 24, 2014

Ensure SDWIS monitoring schedules are updated and all waiver documents are registered into HP TRIM.