



FY 2022 Recommended Budget Budget Question

Board Question #: 20

BUDGET QUESTION: If the FMC plant is being decommissioned, why is there a need for the Sampler positions?

RESPONDING DEPARTMENT/OFFICE: Utilities

RESPONSE: Sampler positions are independent of the FMC decommissioning plan as this facility only has a minor contribution to the required system wide sampling. The facility will be decommissioned in the 2025-time frame and existing staff at the facility will be transferred to the County's two other wastewater treatment facilities.

The request for the sampling positions is due to the increased regulatory requirements being placed on drinking water distribution systems and the sampling compliance program as a whole. This regulatory burden has also increased with the many smaller systems that the Utilities Department maintains.

Currently, the water plants have four licensed operators covering the bacteriological and chemical sampling requirements for the distribution system, community centers, and the schools as well as their regular full-time duties operating the water plants. The request made by the Utilities Department for three samplers and a coordinator is a bare minimum requirement to maintain the current sampling workload. Current sampling schedules for the distribution system and the smaller systems include over 1,200 compliance bacteriological samples, 300 heterotrophic plate count samples, over 200 Nitrite samples, 32 Total Trihalomethane samples (TTHMs), 32 Haloacetic Acid samples (HAA5s), and 40 Water Quality samples annually. At varying intervals and frequencies, depending on the system, the entry points require sampling for parameters that include 17 metals, 26 Volatile Organic Compounds (VOCs), 13 Inorganics, 52 Semi-Volatile Organic Chemicals (SOCs), Nitrate+Nitrite and Cyanide. The Manager and Chief Operator at Motts Water Treatment Plant spend a large portion of their time overseeing the many sampling compliance programs for each system and responding to customer concerns and public education relating to water quality. Program oversight responsibilities (distribution system, community wells, schools and customer concerns) would transition to the Sampling Coordinator. The Coordinator would also work with contract laboratories for compliance with large programs such as the Disinfection Byproducts Rule, Unregulated Contaminants Monitoring Rule (UCMR), the Lead and Copper Rule, etc.

The preeminent driving force behind the timing of these new positions is preparation for meeting new regulatory requirements. The EPA finalized the Revised Lead and Copper Rule which went into effect in January 2021. With this rule, the sampling burden increases tremendously to include childcare facilities and schools in addition to increased sampling throughout the distribution system. This addition alone would increase the current lead and copper sampling from 30 samples every three years to potentially over 3,500. The frequency of

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sampling increases from every three years to annually, with strict monitoring, inventory, and record retention requirements. Additional testing will also be required for the upcoming UCMR. Current requirements for UCMR4 already require sampling at EPA-determined intervals over the course of a couple years resulting in 34 analytes being tested and over 500 data points. This will increase with the upcoming UCMR5 that is set to begin in 2022. The Department is also anticipating extensive changes to monitoring requirements for emerging contaminants such as per- and polyfluoroalkyl substances (PFAS) and many others that will place an additional burden on overseeing and maintaining this program.

ESTIMATE OF STAFF TIME SPENT ON RESPONSE: 45 minutes