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INITIAL DISTRIBUTION SYSTEM EVALUATION GUIDANCE MANUAL

FOR THE FINAL STAGE 2 DISINFECTANTS AND DISINFECTION BYPRODUCTS RULE

CHAPTER 3

<http://www.epa.gov/safewater/disinfection/stage2/compliance.html>

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3.0 Very Small System Waiver

This chapter covers:

- 3.1 Qualifying for the VSS Waiver
- 3.2 Selecting a Stage 2 Compliance Monitoring Site
- 3.3 Next Steps: Preparing the Stage 2 DBPR Compliance Monitoring Plan

EPA recognizes that very small systems typically have small distribution systems where the high total trihalomethane (TTHM) and high haloacetic acid-five (HAA5) levels occur at the same location. For this reason, systems serving fewer than 500 people are automatically exempt from IDSE requirements as long as the criteria in Section 3.1 are met, and EPA or your state does not require otherwise.

If you meet the very small system (VSS) waiver criteria and EPA or your state does not notify you that you need to conduct an IDSE, your system has NO further requirements for the IDSE. You will continue Stage 1 compliance monitoring until **Stage 2 compliance monitoring** starts. If you are in a combined distribution system, you must start Stage 2 compliance monitoring based on the schedule of the system with the largest population in your combined distribution system. If you are not in a combined distribution system, you must start Stage 2 compliance monitoring in 2013 (2014 if you must monitor for *Cryptosporidium* under the Long Term 2 Enhanced Surface Water Treatment Rule). See Chapter 2 for more information on determining your schedule. Refer to Appendix D if you are a **consecutive or wholesale system** for specific issues that you should consider.

This chapter discusses the requirements for VSS waivers. These requirements are also outlined on your **requirements summary sheet** in Chapter 2 of this manual.

3.1 Qualifying for the VSS Waiver

How can I qualify for the waiver?

To automatically qualify for the VSS waiver, you must serve fewer than 500 people and have taken TTHM and HAA5 samples. VSS eligibility is not dependent on your Stage 1 DBPR compliance monitoring or other TTHM or HAA5 data results. The results do not have to be below any particular level for you to receive the waiver.

As long as you have TTHM and HAA5 data, you are qualified for the VSS Waiver. You have ***NO further requirements for the IDSE*** unless EPA or your state tells you otherwise.

Many systems will have Stage 1 DBPR compliance monitoring data that will allow them to automatically qualify, including those on reduced monitoring. Some systems in combined distribution systems, however, may not have conducted Stage 1 DBPR compliance monitoring. These systems can still meet the waiver criteria if they have TTHM and HAA5 data. Below is guidance for systems that have compliance data and those that have operational TTHM and HAA5 data

- Systems with Compliance Data: If you have Stage 1 DBPR compliance data and have submitted TTHM and HAA5 results to your state, you have NO further requirements unless you hear otherwise from EPA or your state.
- Systems with Operational Data: If you have not conducted compliance monitoring under the Stage 1 DBPR but have other TTHM and HAA5 data, you should contact EPA or your state to determine if this data is sufficient to qualify for the waiver. Some of the criteria that the reviewer might use to evaluate your data are:
 - Were samples analyzed by approved methods?
 - Were samples analyzed at a certified laboratory?
 - Are the sites located in areas of maximum residence time?
 - Were samples taken during the month of warmest water temperature?

Consecutive systems that do not have any TTHM and HAA5 data for their system should check with their wholesaler to determine if the wholesaler collected any TTHM and HAA5 data in their system.

What if EPA or my state contacts me and requires me to conduct an IDSE?

Remember that even if you qualify for the VSS waiver, ***EPA or your state may require you to conduct an IDSE.*** IDSE sampling requirements for systems serving < 500 people are minor compared to requirements for medium and large systems. Standard monitoring for systems serving < 500 people consists of preparing a monitoring plan, taking dual sample sets at two distribution system locations during the peak historical month, and completing an IDSE report. Refer to the EPA document, *IDSE Guide for Systems Serving < 10,000 People*, for guidance on conducting standard monitoring.

3.2 Selecting a Stage 2 DBPR Compliance Monitoring Site

All systems serving <500 people are required to take one TTHM sample at the location with the highest TTHM concentration, and one HAA5 sample at the location with the highest HAA5 concentration. You can collect a dual sample set at **one location** if the highest TTHM and HAA5 concentrations occur at the same sample location and during the same month.

EPA recommends that you consider using your Stage 1 monitoring location for Stage 2 DBPR compliance monitoring if it meets these criteria. If you did not have a Stage 1 compliance monitoring location, you should work with your state to select the best Stage 2 compliance monitoring location(s). The high TTHM site will typically be an area of high residence time, located at an extreme end or isolated portion of the distribution system. The high HAA5 site will often be at the same location, unless you have difficulty maintaining a distribution system residual.

You should *not* select high HAA5 sites in locations that regularly or in the summer months have free chlorine residuals less than 0.2 mg/L or with chloramine residuals less than 0.5 mg/L.

3.3 Next Steps: Preparing the Stage 2 DBPR Compliance Monitoring Plan

As the final step before you can begin compliance monitoring for the Stage 2 DBPR, you must develop a **Stage 2 DBPR compliance monitoring plan**. The plan will be similar to your Stage 1 DBPR monitoring plan in that it will identify how you intend to sample for compliance with Stage 2. You do not need to submit the monitoring plan to EPA or your state, but you must keep it on file for state and public review. Note that Stage 1 DBPR compliance monitoring requirements are in effect until you begin Stage 2 DBPR compliance monitoring.

Exhibit 3.1 contains the minimum requirements for what must be included in your Stage 2 DBPR compliance monitoring plan. Because compliance monitoring plans are not addressed as part of the IDSE provisions of the Stage 2 DBPR, *EPA has not included detailed guidance for developing Stage 2 compliance monitoring plans in this guidance manual*. EPA plans to develop other manuals and training that specifically address the compliance monitoring provisions of the Stage 2 DBPR.

See EPA’s website at <http://www.epa.gov/safewater/disinfection/stage2> for an up-to-date inventory of Stage 2 DBPR guidance manuals and training materials, or call the Safe Drinking Water Hotline at 1-800-426-4791.

Exhibit 3.1 Required Contents of Stage 2 DBPR Compliance Monitoring Plans

All Systems	Additional Requirements for Consecutive and Wholesale Systems ¹
<ul style="list-style-type: none"> • Monitoring locations • Monitoring dates • Compliance calculation procedures 	<ul style="list-style-type: none"> • If your state has used its special primacy authority to modify your monitoring requirements, you must include monitoring plans for other systems in your combined distribution system

1. See Appendix D of this manual for guidance specifically for consecutive and wholesale systems.

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