The newsletter of the Indiana Ground Water Association (IGWA)

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THE REVISED TOTAL COLIFORM RULE

Michael J. Schnieders, PG, PH-GW, Water Systems Engineering Inc.

Although initial legislation took place much earlier, the “total coliform rule” (TCR) of 2001 created quite a bit of stress for the groundwater industry. The TCR contained a significant expansion of microbial testing of wells and public water supplies. Beginning April 1, 2016, and earlier in some states, revisions to the TCR begin to take effect. Are you and your customers prepared?

The new revisions reflect a better understanding of coliform occurrence as well as the total coliform and fecal coliform tests. Although often misunderstood in the past, the new revisions and supporting documentation reflect the use of the total coliform test as an indication of potential problems. In my opinion, these changes parallel what we in the groundwater industry have encountered since the TCR became law. Research in our lab has shown many of the problems with coliform-impacted wells stemmed from inactivity and a lack of maintenance, not contamination.

As part of the revisions, the U.S. Environmental Protection Agency eliminated the maximum contaminant level (MCL) for total coliforms and has established a new maximum contaminant level goal (MCLG) and MCL for E. coli. Additionally, the requirements for testing of total coliforms and E. coli are now part of a specific sample plan unique to the public water system. This is an important change as each well is unique and plays a different role in each public water supply.

The revision also expands sampling requirements for smaller, seasonal use systems. In addition to monitoring requirements, the revision calls for the development of “start-up” procedures to address the impacts of idle wells and limit potential exposure. Again, this coincides with vulnerabilities we in the industry have witnessed with idle and inactive wells. In an effort to encourage public water supplies to be more proactive, requirements for assessments are included for systems with a history of problems. The assessment of vulnerabilities and development of corrective action plans prior to the onset of a problem is a recognition of the run to failure/out-of-sight, out-of-mind attitudes many well owners exhibit. This proactive approach has been advocated by groundwater professionals for years.

In addition to more realistic expectations and a better understanding of testing, the new revisions set forth goals for communities to be better prepared in the case of a coliform occurrence. As part of these preparations, a community should understand how to test and what to ask for when testing to better understand the nature of their problem. In addition to the testing, communities should have a reaction plan in place for disinfection, cleaning, or repair as needed in response to a repeat coliform or E.coli occurrence.

Revised Total Coliform Rule continues on page 2
The Revised Total Coliform Rule (continued)

As part of developing an action plan, public water supplies and well owners should compile construction, operation, and maintenance information on their well systems. Additionally, it is advised baseline parameters be established to better assess the type of problems occurring if and when a vulnerability is identified.

As revisions to the total coliform rule begin to take effect this year, many communities are not aware of or have failed to understand vulnerabilities surrounding their well systems. For public water supplies that depend on or utilize groundwater, the guidance of a groundwater professional will be vital to compliance. For additional information, visit the EPA’s website at www.epa.gov. Additional information is available through the American Water Works Association and your state environmental agency.

About the Author
Michael J. Schnieders, PG, PH-GW, is president of Water Systems Engineering Inc. in Ottawa, Kansas. He has worked extensively on designing more effective well systems, water quality issues in both municipal and residential water supply systems, and water chemistry. He is deeply involved in the interpretation of laboratory analyses to troubleshoot operational problems, as well as resource characterization for current and future use. He can be reached at mschnieders@h2osystems.com.

Reprinted from the January 18, 2016 NGWA Tool Kit

TALES FROM THE TRENCHES
Help from the Customer
Troy Alexander, Findlay Bros. Well Drilling

Once in a while you have the customer that is trying to help, or at least they think they are. It happened to me last year right before Thanksgiving. They had a well that had started pumping sand, and due to the age of the well and not knowing any of the construction because of lack of well records we recommended a new well. They had always had trouble from sand from time to time but it was so bad now they could no longer use the well. The area they live in I knew from experience was going to be a challenge, and as I expected, two dry holes later I finally found a vein of gravel to work with. The weather didn’t cooperate at all the whole time we were there. The couple was very understanding even though they were postponing their winter in the south until we finished.

The well turned out good and then came the time to hook it up. We trenched from the old well to the new and tied on to the existing water line. Next came the electrical connection to the existing wire and now comes the part where the customer thinks he is helping. I was standing in the trench with the wire in hand, I “luckily” brushed the wire against the trench sidewall that was wet from the wonderful weather we had — sparks, I touched the wire to the side of the trench again, sparks, yes, the power was on. It had been off before we began; I asked the guy if the power was on. He said, “Yes. I turned it back on for you.”

Just a reminder, if anyone is around while you are working; it’s a good idea to let them know you will let them know when it’s time for the power to be turned back on.

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2016 IGWA SCHOLARSHIP AWARDS

This year we had 7 applicants. All of the applicants met the criteria for the scholarship. Each year it is difficult to make choices.

Our selection process is a blind process. The scholarship committee only received redacted applications. They make their choices based on content only. Our recipients this year are:

Caleb Schulz — Parent is Shelly Schulz, Municipal Pump, Waupun, WI. Caleb has been accepted to the University of Wisconsin. Caleb will be studying mathematics and plans to continue on to medical school to study radiology.

Dustin Remmler — Parent is Dale Remmler, Remmler Well Drilling, Greensburg, IN. Dustin has been accepted to the University of Cincinnati. Dustin will be double majoring in music education and oboe performance.

Megan Weinzapfel — Parent is Jeff Weinzapfel, Weinzapfel Water Well Drilling, Evansville, IN. Megan has been accepted to Western Kentucky University. She will be studying communications disorders.

The IGWA recognizes these students as outstanding applicants. We wish them great success in their pursuit of higher learning.

If your student has submitted an application in the past, they may re-submit every year, even if they were awarded a scholarship in the past.

The IGWA scholarship application is located on the IGWA website at www.indianagroundwater.org or you can call the office at 888.443.7330.

DOT UPDATE

Fred McAninch

As of March 4, 2016:

FMCSA Proposes Entry-Level Driver Training Rule

The Federal Motor Carrier Safety Administration released on March 4 its proposed rule on entry-level driver training.

Class A CDL would require 30 hours of behind the wheel training. Class B CDL would require 15 hours of behind the wheel training. The proposed rule also outlines the knowledge and skills that must be learned rather than just hours behind the wheel.

Behind the wheel includes on driving range and public road driving.

There is no set classroom hours outlined.

CDL drivers looking to upgrade a Class B to Class A will fall under these rules as well.

Implementation by states is set for three years after the effective date of the final rule.

More information can be found at: https://www.fmcsa.dot.gov/newsroom/fmcsa-proposes-national-training-standards-entry-level-truck-and-bus-drivers.

As of December 10, 2015

FMCSA Announced Final Rule on Electronic Recording Devices for Interstate Drivers

FMCS announced its final rule on electronic recording devices for interstate drivers. The rule will take effect two years after the effective date.

The rule details the specifications for the devices, documentation, and procedures.

The rule permits the use of smartphones and other wireless devices as recording devices as long as they satisfy technical specifications, are certified and publicly listed by the agency.

Final rule can be read at: https://www.gpo.gov/fdsys/pkg/FR-2015-12-16/pdf/2015-31336.pdf.

Calendar

November 2016

3–4 IGWA Biennial Tradeshow & Educational Event, Blue Chip Casino, Michigan City, IN

December 2016

31 Deadline for current CEU cycle to renew 2017 license.
2016 BIENNIAL CONVENTION
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Manufacturers & Suppliers!
2016 Expo contracts went out in May. If you did not receive one, you can get a copy at the website www.indianagroundwater.org or by emailing ingroundwater@gmail.com.

Remember if we get your commitment by July 30, you will get a FREE ¼ page ad (or can use that value towards a larger ad) in the August newsletter that will have the full convention sign up for attendees!

Convention Sneak Peak
We will have 14 classes to choose from this year! We have included some classes for environmental drillers as well. Here are a few of the topics for this year:

- IDEM/DNR joint update
- State Police DOT update
- Drilling fluids for environmental drilling
- Solar
- Lead
- Ground Water Monitoring Network
- Pump troubleshooting
- Meters
- Large Drives
- Rig Safety
- Digging Safety
- Filter Pack Designs
- And more to come!

Convention Room Reservations
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Because we believe in quality, we represent these manufacturers
The Occupational Safety and Health Administration (OSHA) released the long-anticipated Occupational Crystalline Silica Rule. The final rule’s key components similar to what was proposed are as follows:

- Reduces the permissible exposure limit (PEL) for respirable crystalline silica to 50 micrograms per cubic meter of air, averaged over an 8-hour shift.
- Requires employers to: use engineering controls (such as water or ventilation) to limit worker exposure to the PEL; provide respirators when engineering controls cannot adequately limit exposure; limit worker access to high exposure areas; develop a written exposure control plan, offer medical exams to highly exposed workers, and train workers on silica risks and how to limit exposures.
- Provides medical exams to monitor highly exposed workers and gives them information about their lung health.
- Provides flexibility to help employers — especially small businesses — protect workers from silica exposure.
- Allows for use of compressed air, dry sweeping, and dry brushing where other cleaning methods are not feasible.

The rule is effective June 23, 2016; however, companies have anywhere from one to five years to comply based on what category a company fits into. Manufacturers are considered in the “General Industry and Maritime” category and will have until June 23, 2018 to comply with most provisions. Of note, however, the construction industry will have until June 23, 2017 to comply and the hydraulic fracturing companies will have the June 23, 2018 date to comply with all provisions except engineering controls, which have a compliance date of June 23, 2021.

However, the water well industry is exempted from additional methods if certain conditions are met.

As explained in the following article that appeared in the April 11, 2016 issue of the NGWA Washington Update.

In Final Crystalline Silica Rule, Water Well Drilling Exempted from Additional Regulation

Following NGWA comments and years of deliberation by the Department of Labor, the final rule governing exposure to crystalline silica was released at the end of March. The final rule stipulates that for vehicle-mounted drilling rigs, no additional measures need to be taken when wet control methods are in use. The exemption from additional respiratory controls is in line with the language suggested in NGWA’s comments filed.

The rule is being challenged by several industry groups, who believe the law’s new restrictions on silica exposure may not be technically feasible, and battles within the court system will likely drag on for years.

NGWA impact: The final rule will save the water well drilling industry significant money that would have been necessary if additional exposure control methods were required.

**IGWA MEMBERSHIP INCREASES!**

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- 177 Contractor members from 77 companies.
- 69 Manufacturer/Supplier members from 34 companies.

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