

# Chemical Monitoring Waivers for Volatile Organic Compounds (VOCs) and Synthetic Organic Compounds (SOCs)

NHWWA December 7, 2021 Sandy Crystall <u>chemwaivers@des.nh.gov</u>

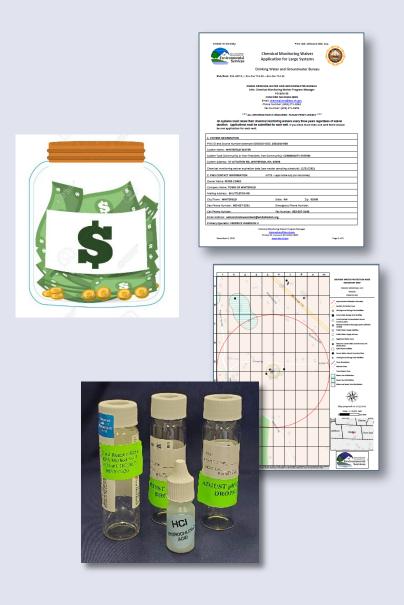
# Socs/Vocs Monitoring Waiver(s) Source Id Source Description 001 BRW /435' NNE OF ADMIN BLDG SOC waiver expires on 12/31/2021. Participat VOC waiver expires on 12/31/2021. Participat

Participation could save money. Reapply. Participation could save money. Reapply.

#### **Overview**

Process.

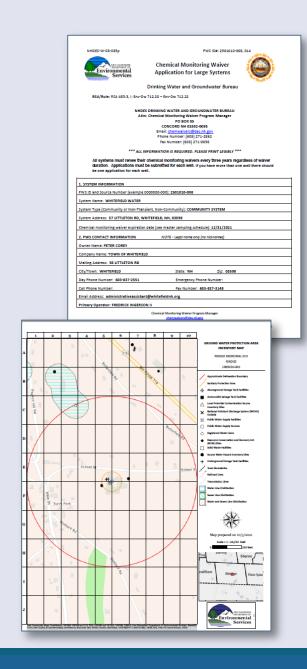
- Chem waiver criteria (rules).
- NHDES review.
- Decision letter.
- Educational mailing.





#### Process

- SOC/VOC Sampling with non-detect results.
- Windshield survey (BMP inspections req'd for large systems).
- Complete/ update Waiver form.
- Submit to NHDES before expiration date.
- NHDES reviews and issues decision letter.
- Distribute educational information and submit completion form to NHDES.





#### **Waiver Criteria**

#### **Eligibility for Waivers**

- Env-Dw 712.20 VOC Contaminants Monitoring Waivers
- Env-Dw 712.21 SOC Contaminants Monitoring Waivers

#### Waiver form requires **updated information**:

- Proximity of certain activities or land uses to the source(s).
- Daily water usage.
- Any new contact information for correspondence.

		State of New Hamps	lire Department	of Environment	al Services Invent	ory of	
			Pote Existing Sources	ntial of Groundwater	Contamination W		
	EPA ID: 0272010-00		the Wellhead	Protection Area			
	SYSTEM NAME: FISH	ERFIELD TOWNHOUSES					
	TOWN(s): BRADFOR	D	interior Western and Con-		- CER ( - to -		
	delineation boundary accompanying map. F feature's DES OneStop	ed on 10/5/2021 by the NHDES D are listed. The map-cell column is or example, a map cell value of 'G- page providing additional informat	in the report indicates it' indicates column 'G fon.	which 262 X 439 7 and row '11'. Text	foot grid cell the site outlined by a blac rec	of facility is locate tangle provides a li	d on the ak to the
	Public Water S	upply Sources and Facili SYSTEM SYS.	ties SYS. ACT.: SRC.	SRC. ACT.: S	RC. WELL	WELL POP.	MAP
	NAME	ADDRESS: TYPE:	TYPE:	ACTIVE SG	EC. TYPE:	DEPTH: SERVE	D: CELL:
	0272010 RSHERFIELD -001-G TOWNHOU 0272010 RSHERFIELD		ACTIVE	ACTIVE PR		40	
		ES BRADFORD		ALINE PR		1	ы
	These are facilities the Hazard Inventory Site	ervation & Recovery Act I generate hazardous waste. If a rele	ase is documented, it i	is also listed under th			
	FACILITY SITE			FACILITY ADDRES	S: STATU:	S: REGULATED GEN. TYPE:	MAP CELL:
	NHD510114218-00045 NHD510126469-00104			S7 W MAIN ST, BRADFORD MAIN ST, BRADFORD		STATE	r3 G9
	NHD510127434-00028	22 CAR CARE OF BRADFORD	MAINS	T, BRADFORD	INACTIVE	REGULATED STATE REGULATED	74
	Source Water 1	lazard Inventory Sites				REGION ED	
	This includes all Grou to ensure water resour Risk Codes: 1 - Immed	whether Hazard Inventory, Remodil ce protection. If status is not indicat iate risk to human health. 2 - In we h level source. 4 - Surface water imp alternate water availabs. 7 - Low o sent groundwater quality standard	ition Sites, and Initial ad, it is assigned to a p libead protection area	Response Spill Sites : roject manager. or within 1000' of we	regulated by NHDES		
	<ol> <li>Free product or hig</li> <li>High concentration</li> <li>No sources, no and</li> </ol>	h level source. 4 - Surface water imj , alternate water availabe. 7 - Low o sient groundwater quality standard	pact. 5 - Groundwater i oncentration, alternate violations onsite. NDY	impact, no alternate v water available. - Not yet defined.	saler.		
	FACILITY SITEA:	FACILITY NAME:	FACILITY		PROJECT STAT TYPE:		MAP CELL:
	198400068-0001021 198400068-0027325	FORMER BOWIES MARKET FORMER BOWIES MARKET			LUST	7	69 69
	199202030-0003442	MERRIMACK COUNTY TELEPHONE CO	126 E MAIN ST, BRA MAIN STREET, BRAD		LINER CLOSED		rs
	199210007-0003972	FORMER CRESSY AND WILLIAM	MAIN ST, BRADFOR	• I	LUST CLOSED		74
	$\geq$				C	Ground	SARE
and the second se		K				45 GP.	ARE
	G	What the	No. of Concerned				7
	GAS	-	Statement and	and the second			+ `
4		70.)	20°0°	-	and		2
			20	-	14	Ne d	ANKEN C
			00	175		0	gone :
			3	1	Tr.	1	1'er
				7	-	~	- inter
				.6	L. Sr.	3	
						~	1.
					dia hit		7
				-		•	Connection
			and E				
			Alle				
		1					
		1 2000		-			
		199					
		ARENGES			Mar Inte	a transfer	
i		and operations are used to all the	read for the second second		100.000 P00500	sector and the	2.575



#### **Examples of Criteria in Rules**

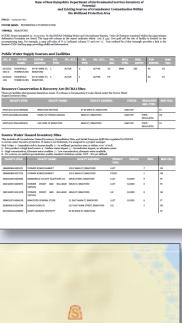
- Compliance-related requirements (addressing deficiencies).
- Distances of known or potential contamination sources, existing ASTs or USTs, solid waste facilities, other land uses, depending on waiver sought:
  - Within certain distance of **source**:

examples: parking lot (50 ft.), UST with petroleum product (1,000 ft)

• Within sanitary protection area (SPA):

examples: septic system, storage of regulated substances, chemical use

 Within source water protection area (SWPA): examples: solid waste facility, landfill.







#### **Large Systems**

#### BMP inspections

- The O/O shall conduct inspections of all potential contamination sources (PCS) to ensure compliance with the best management practices specified in Env-Wq 401.
  - Once every 3 years and within 6 months of the renewal due date.
  - Signature on BMP form required to certify that the inspections required by (e), above, if applicable, have been completed.
  - Double-check to ensure form is complete (and signed).



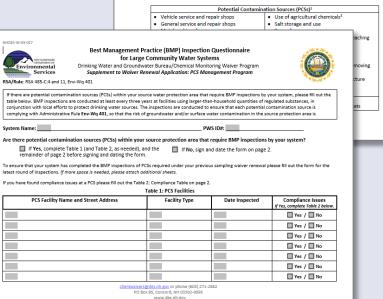
DWGB 22-4

Best Management Practices (BMPs) for Groundwater Protection

Approximately 75% of New Hampshire residents rely primarily on groundwater for their drinking water. Recognizing the importance of protecting the nature quality of groundwater, the legislature passed the Groundwater Protection Act (ISA 485-C) in 1991. This legislation recognized that a wide variety of activities involve the use of materials that car, if not properly handles, contaminate groundwater. There have been numerous instances of groundwater contamination in New Hampshire from leaking storage facilities, improver waste disposal, accidental spills and even from normal use of these materials. Potentially contaminating substances can be more safely managed if certain basis guidelines are followed. The Groundwater Protection Act directed the New Hampshire Department of Environmental Services (NHDES) to adopt rules specifying best management practices (BMPs) for the Potential Contamination Sources (PGS) Directed below.

NHDES developed and adopted New Hampshire Code of Administrative Rules Part Env-Wo 401 Best Management Practices for Groundwater Protection, which apply to all potential contamination sources in the state. The BMPs within the rules are essentially common-sense operating practices that are simple and economical to implement. The purpose of the BMPs is to help prevent a release of regulated substances, as defined under this rule. Regulated substances include oil, as defined under R&I 146-A, III, regulated contaminants established pursuant to R&I 485-CS, and hazardous substances listed under the Code of Federal Regulation (CFR), within 40 CFR 302. Cleaning up the release of a regulated substance can be very expensive. Following the BMP rules reduces environmental liability and minimizes potential cleanup cost.

Page 1 of 2



2021-01-26

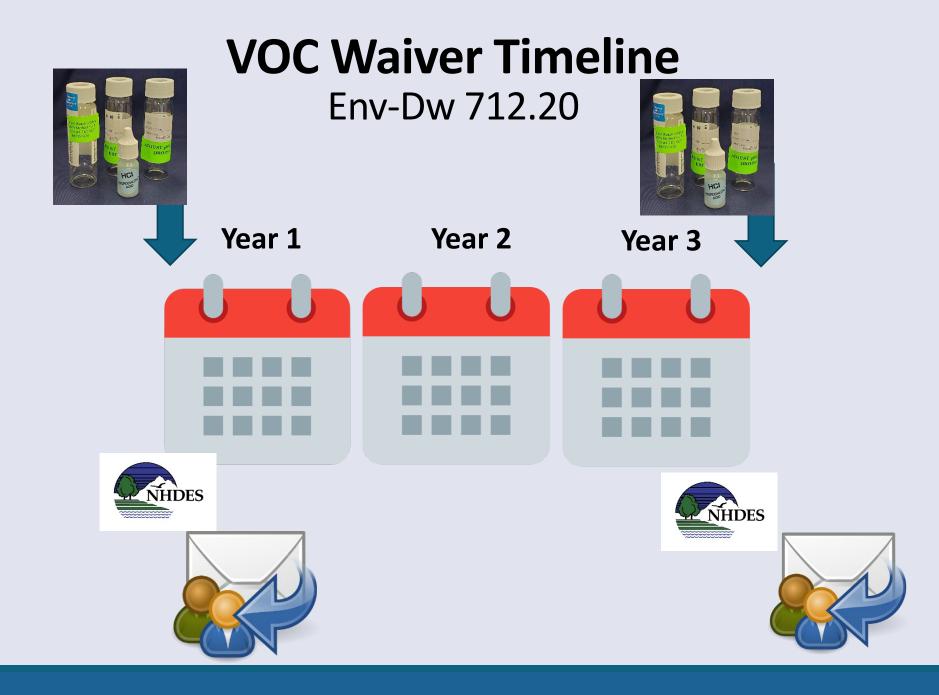


## **Waiver Decision Letter**

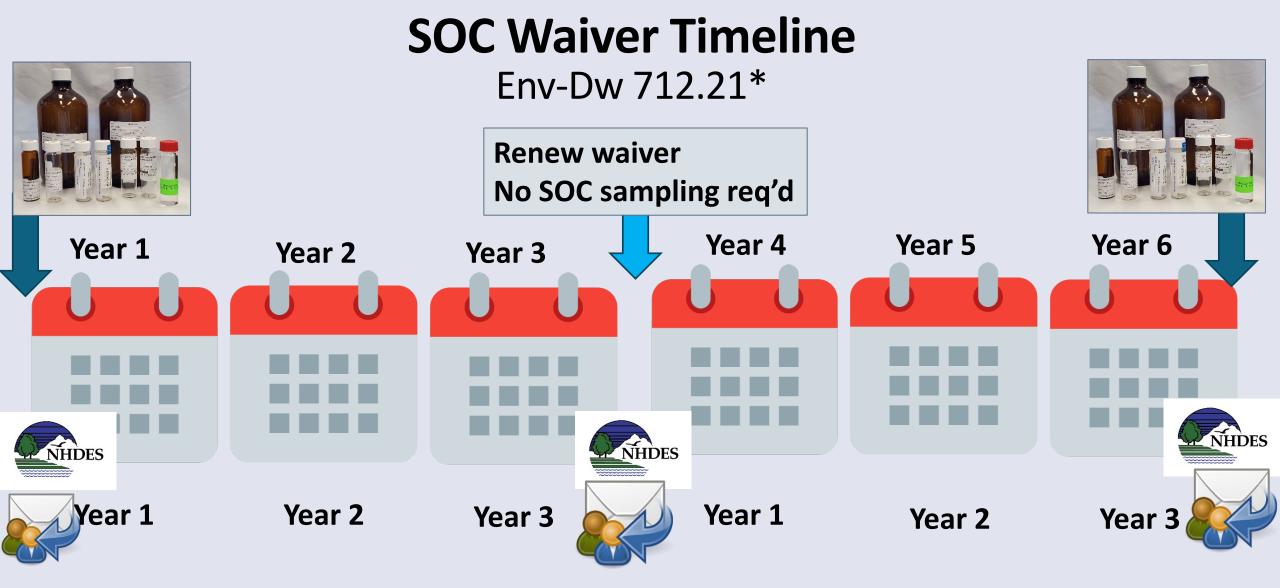
- Approval of SOC or VOC waiver where the criteria have been met.
- Identifies the criterion/ criteria that resulted in VOC or SOC waiver denial.
- Spells out requirements to complete the system's responsibilities for the approved waiver.
- NHDES email includes:
  - Decision letter.
  - Got Clean Drinking Water? brochure (updated).
  - Sample letter to residents/ Sample letter to PCSs.
  - Educational mailing completion form.
  - PCS-related documents where applicable.











\* There are also three-year SOC waivers where certain conditions exist such as pesticide application area, power line, active railroad.



# **Educational "Mailing" and Certification**

- Educational materials required to be distributed within 30 days of the waiver approval to those within the SWPA.
- As a condition of any waiver granted, the O/O shall distribute educational materials provided by the department within 30 days of the date of the waiver approval and at least once every 3 years thereafter to:
  - Residents within the source water protection area;
  - Owners of known and potential contamination sources within the source water protection area.
- Time extension is available if necessary and requested.





#### Resources

NHDES OneStop for MSS

http://www4.des.state.nh.us/DESOnestop/BasicSearch.aspx

- OneStop Data Mapper (locations w/aerial imagery) <a href="http://www4.des.state.nh.us/onestopdatamapper/onestopmapper.aspx">http://www4.des.state.nh.us/onestopdatamapper/onestopmapper.aspx</a>
- Fact Sheet: Chemical Monitoring Waivers
   <u>https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/dwgb-12-4.pdf</u>
- Web page: Chemical Monitoring Waivers
   <u>https://www.des.nh.gov/water/drinking-water/public-water-systems/chemical-monitoring-waiver</u>
- Water system updates: <u>imupdates@des.nh.gov</u>



DWGB-12-4

2021

#### **Chemical Monitoring Waivers**

The Chemical Monitoring Waiver Program can save public water systems (PWSs) up to several hundred dollars per sampling location annually in required sampling costs. Community and non-transient noncommunity water systems are required under the federal SaFe Drinking Water Act to test annually for both volatile organic compounds (VDCs) and synthetic organic compounds (SDCs). PWSs will sample less often for VDCs and SOCs if they obtain vaivers. Waivers are granted based on source protection criteria. There is no cost to apply, the application process is not difficult, and help is available.

To be eligible for waivers, a public water supply must put into effect a four-step source protection program.

- 1. Delineate the area to be protected. This is done by NHDES or as part of the new source approval process. For groundwater sources, the area to be protected is called a wellhead protection area. The wellhead protection area is the land area from which groundwater may flow to the well. If you have a bedrock well, your wellhead protection area area within any simply be a circle drawn around the well with the size of the circle dependent upon the maximum daily volume withdrawn from the well. For non-bedrock woll, your wellhead protection area. The wellhead protection area the well-bedrock and overhourden wells, existing hydrogeologic information may be used to delineate the wellhead protection area for new bedrock and overhourden wells may be more accurately delineated on a current hydrogeologic assessment approved by NHDES. For surface water sources, the protection area consists of the portion of the watershale within 4,000 feet tuggradient of the intake. NHDES provides a map to all waiver applicants that will show the protection area(s) for your source).
- Inventory potential contamination sources (PCSs). PCSs are facilities that use or handle greater than household quantities of regulated substances (see a list of common PCSs on the next page). To apply for a waiver, you must list or update all PCSs within the source protection area. The map provide by NHDES will assist you with this task.
- 3. List land usage in the sanitary protective area. The sanitary protective area is the land immediately around a well. It ranges from 75 feet to 400 feet depending upon the type of water system and the maximum daily volume taken from the well. Land usage in the sanitary protective area is critical to a well's protection due to its proximity. This step does not apply to surface sources.
- 4. Manage PCSs and other activities that may contribute to contamination of groundwater in your protection area. Management activities required for the waiver program depend on the size of the PWS and the type of PCSs. All waiver recipients must deucate (by means of informational flyers and form letters) residents and businesses within the source protection area. Large public water systems must also develop a program to visit and inspect all PCSs at least once every three years. Large systems with a significant number of PCSs must bolian legal authority to enforce state rule fun-VB

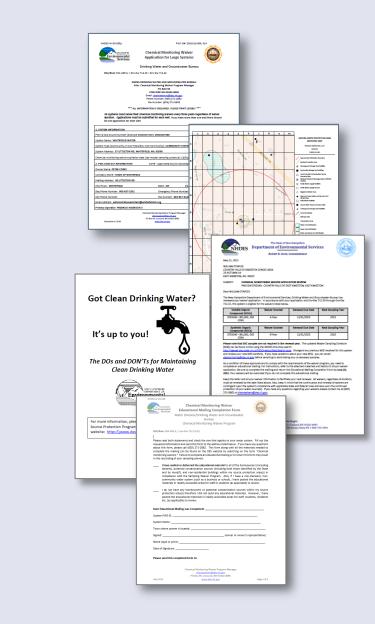


#### **In Review**

Process.

Ę

- Chem waiver criteria (rules).
- NHDES review and decision letter.
- Distribution of educational materials.
- Certification of ed material distribution.
- Resources.







## **Any Questions?**

chemwaivers@des.nh.gov

603-271-2862









