



4.0 Regulatory Compliance Schedule

The City’s current position with respect to ability to comply with both recently-enacted and impending/future regulations using existing water treatment processes is summarized in Table III-14. A summary of key compliance dates is presented in Table III-15.

Table III-14			
Regulatory Compliance Assessment Summary:			
City of Lawrence w/Current Treatment			
Requirement	Standard	Existing System Performance	Compliance Status
Interim ESWTR (Effective January 2002)			
Filtered Water Turbidity	0.3 NTU for > 95% of monthly samples 1 NTU Maximum	< 0.3 NTU < 1 NTU	Compliance Expected Compliance Expected
<i>Cryptosporidium</i> Removal	2 log	-	Compliance Expected
Microbial Benchmarking/ Disinfection Profiling	TTHM > 0.064 mg/L ⁽¹⁾ HAA5 > 0.048 mg/L ⁽¹⁾	< 0.064 mg/L < 0.048 mg/L	Not Required by KDHE
Stage 1 DBPR (Effective January 2002)			
TTHM MCL (system avg.)	0.080 mg/L	0.043 – 0.060 mg/L	Compliance Expected
HAA5 MCL (system avg.)	0.060 mg/L	0.029 – 0.037 mg/L	Compliance Expected
Chloramine MRDL	4.0 mg/L maximum	Avg. 3.5 mg/L	Compliance Expected
Enhanced Coagulation	15-30% TOC Removal	30% - 50% Avg. TOC Removal	Compliance Expected
Stage 2 DBPR Phase 1 (Effective July 2007)			
TTHM MCL ⁽²⁾	0.120 mg/L	0.034 – 0.066 mg/L	Compliance Expected
HAA5 MCL ⁽²⁾	0.100 mg/L	0.017 – 0.045 mg/L	Compliance Expected
Stage 2 DBPR Phase 2 (Effective July 2010)			
TTHM MCL ⁽³⁾	0.080 mg/L	0.034 – 0.066 mg/L	Compliance Expected
HAA5 MCL ⁽³⁾	0.060 mg/L	0.017 – 0.045 mg/L	Compliance Expected
Filter Backwash Rule (Effective June 2004)	Governs in-plant waste stream recycling.	No in-plant recycling	Compliance Expected
LTSWTR, Stage 2 (Effective July 2010)	<i>Cryptosporidium</i> removal, inactivation ⁽⁴⁾	<i>Cryptosporidium</i> inactivation not Provided	Possible non-compliance if inactivation is required.
⁽¹⁾ Not an MCL. Criteria used to determine if microbial benchmarking and/or disinfection profiling is req'd. ⁽²⁾ MCLs based on 4-quarter running annual average at “current” individual monitoring sites. ⁽³⁾ MCLs based on 4-quarter running annual average at “revised” individual monitoring sites. ⁽⁴⁾ <i>Cryptosporidium</i> removal may be required, based on source water monitoring results			



**Table III-15
Key Dates for SDWA Regulations**

Date	Regulation	Activity / Compliance Requirements
Jan. 1, 2002	IESWTR	Combined Filter Effluent Turbidity: 0.3 NTU max for minimum of 95% of monthly measurements Performance requirements for individual filters Monitor individual filters @ 15 minute intervals
Jan. 1, 2002	Stage 1 DBPR	Revised MCL for TTHM New MCLs for HAA5, chlorite, chlorine dioxide MRDLs for chloramines, chlorine dioxide TOC removal requirements
Jan. 2002	Stage 1 DBPR	Initiate monthly source water, finished water TOC monitoring
Dec. 2003	Radionuclides	Revised MCLs for radionuclides effective
July 2004	LT2ESWTR, Stage 2 DBPR	Projected regulatory promulgation date.
Oct. 2004 ⁽¹⁾	LT2ESWTR	Deadline for submittal of source water monitoring schedule to KDHE
Jan. 2005 ⁽²⁾	Stage 1 DBPR	Recommended deadline for initiating IDSE monitoring
Jan. 2005 ⁽¹⁾	LT2ESWTR	Deadline for initiating 2-year source water <i>Cryptosporidium</i> , <i>E. coli</i> , & turbidity monitoring program
July 2006 ⁽²⁾	Stage 2 DBPR	Deadline for submittal of report to KDHE summarizing IDSE monitoring results
July 2006 ⁽¹⁾	LT2ESWTR	Begin disinfection profiling ³
Jan. 2007 ⁽¹⁾	LT2ESWTR	Deadline for submittal of results of 2-year source water monitoring program to KDHE
July 2007 ⁽²⁾	Stage 2 DBPR	Compliance with “Stage 2A” MCLs at individual system monitoring sites
July 2007 ⁽¹⁾	LT2ESWTR	KDHE determines <i>Cryptosporidium</i> bin classification Complete disinfection profiling with one year of data ³
July 2010 ⁽¹⁾	LT2ESWTR	Deadline for compliance with additional <i>Cryptosporidium</i> treatment requirements ⁽⁴⁾ Deadline for submittal of documentation for utilization of microbial toolbox options to KDHE
July 2010 ⁽²⁾	Stage 2 DBPR	Compliance with “Stage 2B” MCLs at individual system monitoring sites ⁽⁴⁾

⁽¹⁾Assumes promulgation of LT2ESWTR during May 2004.
⁽²⁾Assumes promulgation of Stage 2 DBPR during May 2004.
⁽³⁾Unless KDHE approves use of existing disinfection profiling data.
⁽⁴⁾Extension of up to two years can be granted by KDHE if capital improvements are required to achieve compliance.