

## Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

### Department of Environmental Protection

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October 30, 2020

# IMPORTANT INFORMATION For Public Water Suppliers with surface water supplies

#### Dear Public Water Supplier:

This correspondence provides you with a reminder of available and important information about Cyanobacteria and Public Water Systems (PWSs), specifically those with surface water supplies. As you may recall, MassDEP provided several documents related to cyanobacteria and PWSs in September 2018. Since then, updates to the 2018 documents and new resources have been developed to assist PWSs with preparing for and responding to Cyanobacterial Harmful Algal Blooms (CyanoHABs). Please use the information below to update your source protection and emergency response plans in preparation for possible future CyanoHAB events. These resources include:

- Cyanobacteria and Public Drinking Water Supplies in Massachusetts Fact Sheet [updated]
- PWS Bloom Tracking Form (a technical assistance tool for voluntary use) [updated]
- Cyanobacteria and Cyanotoxins Contract Services List [updated]
- Cyanobacteria Guidance for PWSs [updated]
- Notification of Copper Algaecide Application [NEW link provided below]

#### **US EPA HEALTH ADVISORY LEVELS & UCMR4**

There are currently no federal or state regulations for cyanobacteria or cyanotoxins; however, in 2015, the U.S. Environmental Protection Agency (US EPA) released drinking water health advisory (HA) levels for two cyanotoxins – microcystins and cylindrospermopsin. In addition, assessment monitoring for 10 cyanotoxins (nine cyanotoxins and one cyanotoxin group) remains underway by participating PWSs from 2018 through 2020 under the fourth Unregulated Contaminant Monitoring Rule (UCMR4).

The information in this letter will assist UCMR4 participating PWSs to understand their UCMR4 cyanotoxin results. EPA has requested contract labs prioritize analyzing cyanotoxins under UCMR4 and provide early notification turnaround time (TAT) on any results greater than the HA for expedited notice to PWSs and the state. If you receive notice of a result above the HA, please immediately contact your regional Drinking Water Program (DWP) for next steps. At a minimum, you will be requested to collect

and analyze a confirmation sample, provide public notice, and post the results in your next Consumer Confidence Report (CCR). MassDEP DWP contacts for UCMR4 are as follows:

WERO	Cathy Wanat	413-755-2216	Catherine.Wanat@mass.gov	
CERO	Paula Caron	508-767-2719	Paula.Caron@mass.gov	
NERO	Amy Lachance	978-694-3260	Amy.Lachance@mass.gov	
SERO	Chuck Shurtleff	508-946-2879	Charles.Shurtleff@mass.gov	
You may also contact the Drinking Water Program at <a href="mailto:program.director-dwp@mass.gov">program.director-dwp@mass.gov</a> . Subject: UCMR4 Sampling				

For further information on US EPA's HA levels and UCMR4 monitoring, please go to the following links:

- <a href="https://www.epa.gov/cyanohabs/epa-drinking-water-health-advisories-cyanotoxins">https://www.epa.gov/cyanohabs/epa-drinking-water-health-advisories-cyanotoxins</a>
- https://www.epa.gov/sites/production/files/2017-03/documents/ucmr4-fact-sheetcyanotoxins.pdf

#### **PLANNING & EMERGENCY PREPAREDNESS**

In continued alignment with US EPA's strategy, MassDEP's DWP recommends a preventative approach to cyanobacteria, which includes source water protection, reservoir management, and emergency response planning as appropriate methods to address cyanobacteria and cyanotoxins. MassDEP encourages PWS to incorporate all preventative activities to prevent and address CyanoHABs into routine operations and maintenance plans including the Emergency Response Plan ERP.

Many PWSs are in the process of developing or finalizing their Risk and Resilience Assessment (RRA) required under America's Water Infrastructure Act (AWIA) of 2018. Under AWIA, each community PWS serving greater than 3,300 people, which perform or update a RRA must also prepare or revise an ERP that includes strategies, plans, procedures and resources that that can be implemented, and identification of equipment that can be utilized in the event of a malevolent act or **natural hazard** (e.g., CyanoHAB) that threatens the ability of the water system to deliver safe drinking water.

PWSs with surface water sources should be evaluating their risks to CyanoHABs in relation to AWIA and 310 CMR 22.04(13)(a), and ensuring that detailed steps the water supplier will implement in response to a CyanoHAB are included within the ERP. **Specifically, PWS at minimum should have in place a contract or process for rapid procurement with a laboratory able to provide cyanotoxins analyses with a fast TAT, and identification of alternative source options**.

The below table provides the EPA certification deadlines for PWSs serving >3,300 persons under AWIA

POPULATION SERVED	RRA CERTIFICATION	ERP CERTIFICATION DUE TO EPA	# OF APPLICABLE
	DUE TO EPA		PWSs IN MA
>100,000	March 31, 2020	September 30, 2020	6
50,000 – 99,999	December 31, 2020	June 30, 2021	25
3,301 – 49,999	June 30, 2021	December 30, 2021	226

While the MassDEP guidance offers general information to enhance one's knowledge of cyanobacteria and cyanotoxins, it is specific to PWSs with surface water supplies. It is not designed for PWSs with sources designated as Groundwater Under the Direct Influence of Surface Water (GWUDI), or PWSs

using groundwater sources, nor does it provide specific directives for responding to a CyanoHAB as actions will be system specific based on PWS capabilities.

MassDEP has provided support in CyanoHAB response to PWSs experiencing algae events upon request including monitoring assistance and cyanotoxins analyses and will continue to assist PWS with CyanoHAB preparedness and response.

#### CyanoHAB SURVEY

MassDEP distributed a survey in July 2020 to surface water suppliers to determine the extent of preventative and response measures for cyanobacteria events. The data received from this survey will be used to develop additional assistance tools for cyanobacteria preparedness and response. As more information regarding cyanobacteria and cyanotoxins develop, MassDEP will ensure it is passed along to PWSs. If you already filled out the survey, you do not need to do so again, but for those PWSs who missed the survey, it is not too late to participate. Please provide your input on this important subject by November 20, 2020 at: https://www.mass.gov/forms/wurp-public-water-supplier-cyanobacteria-survey

#### STATE AGENCY CYANOHAB COORDINATION

MassDEP and the Massachusetts Department of Public Health (DPH) both have jurisdictional responsibility to address CyanoHABs. MassDEP has jurisdiction over public drinking water systems and their sources and is the lead agency to ensure the protection of public drinking water under the federal Safe Drinking Water Act. DPH is the lead agency for making health-based recommendations regarding potential exposures to CyanoHABs at public waterbodies used for recreational purposes such as swimming, boating, and fishing. Therefore, MassDEP and DPH have developed an interagency coordination document that serves to identify the state roles, responsibilities, and communication protocols for responding to reports of potential or confirmed CyanoHABs. MassDEP notifies DPH of all reported CyanoHABs including those in a PWS source to enhance state agency communications, eliminate any duplicative response efforts, and collaborate on public notification postings around a PWS source that may also have limited recreational use. DPH also provides an online listing of current CyanoHAB advisories in recreational waterbodies at <a href="https://www.mass.gov/alerts/harmful-cyanobacterial-bloom-advisories-in-ma">www.mass.gov/alerts/harmful-cyanobacterial-bloom-advisories-in-ma</a>. Both agencies will continue to collaborate on CyanoHAB response efforts as well as track these events statewide.

#### **IMPORTANT UPDATED RESOURCES**

MassDEP: https://www.mass.gov/guides/cyanobacterial-harmful-algal-blooms-cyanohabs-water

• MassDEP Guidance on Cyanobacteria and Public Water Systems

This is a 52 page document that provides an introduction to cyanobacteria and cyanotoxins including what they are, how fast they can occur, exposure risks and health effects, and potential impacts they may have on Public Water Systems with recommended strategies focused on prevention of cyanobacterial harmful algal blooms (CyanoHABs), as well as numerous resource links.

www.mass.gov/doc/massdep-guidance-cyanobacteria-and-public-water-systems

Cyanobacteria and Public Drinking Water Supplies in Massachusetts Fact Sheet

A four-page document that provides basic information about cyanobacteria and its potential impact on PWSs with a specific focus on source water protection as a preventative measure. <a href="www.mass.gov/doc/public-water-system-fact-sheet-cyanobacteria-and-public-drinking-water-supplies-in">www.mass.gov/doc/public-water-system-fact-sheet-cyanobacteria-and-public-drinking-water-supplies-in</a>

#### PWS Bloom Tracking Form

A four-page technical assistance tool for voluntary use by PWS operators designed to support initial identification of algae blooms and track ongoing events. <a href="www.mass.gov/doc/public-water-system-bloom-tracking-form">www.mass.gov/doc/public-water-system-bloom-tracking-form</a>

#### • The Cyanobacteria and Cyanotoxins Contract Services List:

This is a list of companies and contact information that have been identified as performing services related to cyanobacteria and cyanotoxin analyses. <a href="www.mass.gov/info-details/cyanobacteria-andor-cyanotoxins-contract-services-list">www.mass.gov/info-details/cyanobacteria-andor-cyanotoxins-contract-services-list</a>

#### • The Notification of Copper Algaecide Application form:

This form is required to be completed by all PWSs applying a copper containing algaecide to a surface water source and submitted to the MassDEP regional office per 310 CMR 22.20B(8). <a href="www.mass.gov/lists/source-water-protection-forms-and-templates#forms-">www.mass.gov/lists/source-water-protection-forms-and-templates#forms-</a>

If you do not currently receive e-mails from the Drinking Water Program Director and would like to, please send an email to <a href="mailto:program.director-dwp@mass.gov">program.director-dwp@mass.gov</a> with the subject line "Add to DWP Email Account" and your affiliation, title and contact information in the body of the email.

Please contact me at <a href="mailto:program.director-dwp@mass.gov">program.director-dwp@mass.gov</a> Subject: Cyanobacteria, if you have any questions. Thank you for your attention to this important issue.

Sincerely,

Yvette DePeiza, Program Director

MassDEP Drinking Water Program

Cc EPA, DWP Chiefs, BOH