

Aircraft Drinking Water Symposium & Expo December 4-5, 2013 Las Vegas, NV





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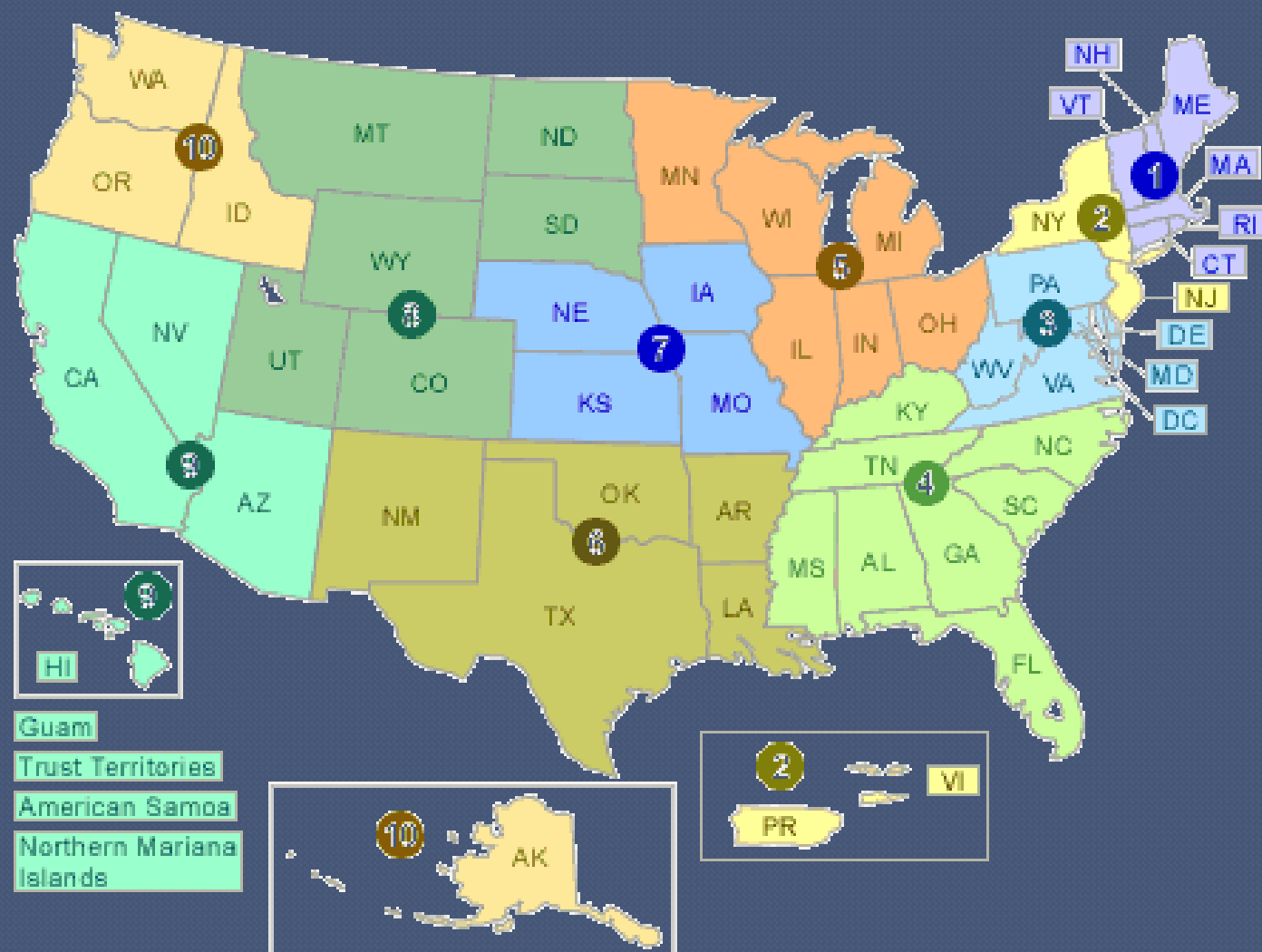
ADWR General Information & Updates

- US EPA HQ Contacts: Allison Wantanabe, Roger Howard, Carol DeMarco, ~~Steve Clark~~ ix nay, amscray
- US EPA Region 9 Contacts: Kevin Ryan & Anna Yen (enforcement_____?)
- Region 9 Inventory: CA, AZ, HI, NV, Pacific Islands (Guam, American Samoa & N. Marianna Islands)
- Compliance Timeline: October 19, 2011 (April 19, 2011 –initial Reporting Date)
- Updates: Guidance for Regions & Partners
 - Applicability Memo, Violations Memo, MOU between EPA & FDA, Communication Strategy, Interstate Carrier Conveyance, Information Requests –Section 1445s,
 - ARCS, Audits

US EPA ADWR CONTACTS

- Allison Watanabe, Program Manager
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 - Roger Howard, Aircraft Reporting and Compliance System (ARCS)
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 - Carol DeMarco, Water Enforcement Division
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 - Kevin Ryan, Region 9 ADWR Coordinator
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US EPA Regions



EPA has ten regional offices across the country, each will directly implement the ADWR with the air carriers. ***Jurisdiction determined by the Region in which an air carrier is headquartered.***

US EPA Region 9 Inventory

9 Airlines, 4 States, Numerous Aircraft

- Allegiant Air LLC - Las Vegas, NV
- Hawaiian Airlines Inc – Honolulu, HI
- Mesa Airlines Inc – Phoenix, AZ
- Qantas Airways Limited –Los Angeles, CA (to be removed)
- Sierra Pacific Airlines Inc – Tucson, AZ
- Swift Air LLC – Phoenix, AZ
- US Airways Inc –Tempe, AZ
- Virgin America Inc –Burlingame, CA
- Vision Airlines Inc – Las Vegas, NV

Compliance Dates

- ◉ By April 19, 2011, each air carrier must report
 - A complete inventory of existing aircraft
 - That it has developed a coliform sampling plan and an operations and maintenance plan that cover each existing aircraft
 - The frequency for routine coliform sampling and routine D&F for each existing aircraft
- ◉ By October 19, 2011, air carriers must comply with all remaining requirements including
 - Conducting and reporting routine D&F and routine sampling

ADWR Updates and Guidance

Applicability Memo

- Assist EPA Regions to determine applicability of Rule for following core issues:

The air carrier does not sell tickets
(interstate commerce)

The air carrier is a foreign based carrier
(international routes)

- Memo outlines criteria and define issues - 25 daily passenger requirement, non-ticketed passengers, what is interstate commerce, foreign air-transport agreement with FAA (serving single or multiple US cities)

ADWR Updates and Guidance

Violations Memo

- Describe how Aircraft Reporting and Compliance System (ARCS) will generate violations & address how violations are bundled together -such as one violation per corrective action
- Draft incorporates comments from Office of Enforcement and Compliance Assistance and Office of Ground Water and Drinking Water - Final expected end of August 2011
- Compliance Determination SOP (Region 4)

ADWR Updates and Guidance

Memorandum of Understanding

- MOU between EPA and FDA is at FDA for review –was ready for signature end of August 2011
- MOU will identify regional contacts - FAA regional air carrier/operator certificate management & furnish a communication protocol
- May help redefine roles and responsibilities - currently EPA and FDA jointly regulate Interstate Carrier Conveyances (ICC) through a 1978 MOU
- UOM – Understanding of Mis-Characterization ?

ADWR Updates and Guidance

Memorandum of Understanding

- FAA not a part of the MOU
- FAA has no regulations that directly affect potable water but have maintenance requirements for aircraft (14 CFR 43)
- Continuous airworthiness maintenance and inspection program (14 CFR 25), which includes tracking servicing information, capacity of tanks, and other relevant information

ADWR Updates and Guidance

Public Water System Communication Strategy 2011– Hot off the Press?

- Case study questionnaire regarding how MCL exceedances at PWS are communicated
- May pilot this strategy with associated Regions and example cities

PWS → Airports → Airlines → Concessionaires?

PWS → Airports → Airlines/Concessionaires options?

...Airlines → Pilots → Aircraft Personnel – options included?

ADWR Emergency Contacts

- US EPA Region 9 Duty Officer (24/7): 1-800-300-2193
- US EPA National Response Center: 1-800-424-8802



ADWR Updates and Guidance

Interstate Carrier Conveyance

- US EPA to formally rescind Water Supply Guidance 29 –
<http://www.epa.gov/safedinkingwater/wsg/wsg29.pdf>
- US EPA will identify train, bus, and boat stakeholder groups to address ICC
- Region 3 has developed an Administrative Order and Administrative Order on Consent with Amtrak –see ICC 2013 Fact Sheet
- Questions from ICC community → Cindy Mack and Carol DeMarco

ADWR Updates and Guidance

Delegation of Authority -Status

- NPDWR Subpart X Authority cited
- For invalidating samples, public notification determinations, receive & request reports, O&M plans, from air carriers – section 1445s information requests
- For the most part, delegated to Assistant Administrator for Water and Regional Administrators (some limitations for electronic reporting)
- Redelegation to OGWDW Director and Regional Division Managers (pending in Region 9)

Aircraft Water Supply and Transfer Chain, cont.

◉ Airport Watering Points

- Regulated by FDA
- Inspections by FDA to ensure regulations are enforced
- Region 6 NBC FOIA

◉ Aircraft Water System

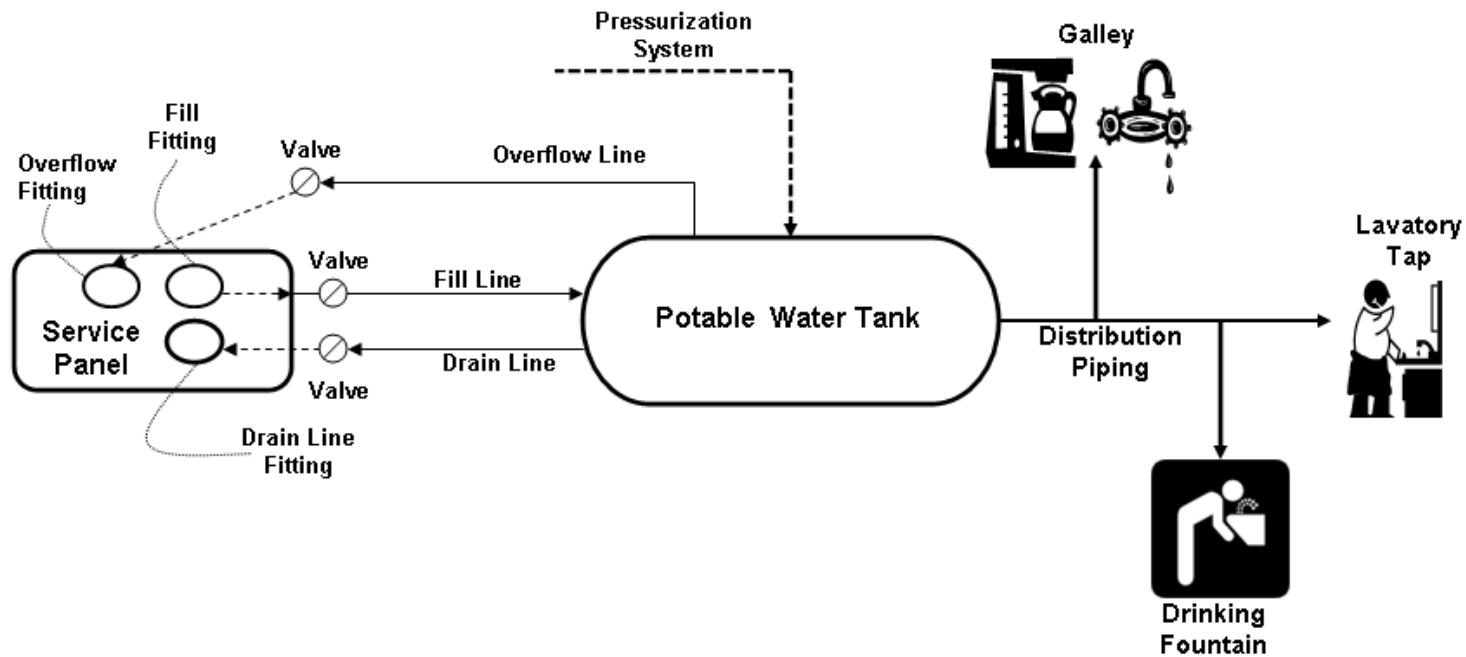
- FDA approves design
- Regulated by ADWR
- Contamination can occur during boarding process or from stagnation in aircraft water system
- Routine D&F and other O&M requirements are intended to ensure water quality is maintained

Components of the Aircraft Water System

- Water service panel
- Filler neck of the aircraft finished water storage tank
- Onboard water storage tank(s)
- Piping
- Supplemental treatment equipment
- Galley and lavatory faucets
- Other plumbing fixtures that supply water to passengers or crew



Components of the Aircraft Water System, cont.



Public Health Protection Measures

- ◉ Water System O&M and Coliform Sampling Plans
 - Routine Disinfection and Flushing based on manufacturer recommendations
 - Routine Coliform Sampling based on frequency of D&F
- ◉ Boarding Water Procedures
- ◉ Training Requirements
- ◉ Corrective Action
- ◉ Public Notification
- ◉ Self-Inspections
- ◉ EPA compliance audits
- ◉ Reporting and Recordkeeping
- ◉ Violations for Failure to Comply

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Aircraft Water System Operating Status

- For purposes of compliance determination, aircraft water systems may be designated as either active or inactive in the ADWR Reporting and Compliance System (ARCS)
- Active Status
 - Aircraft water system is in normal operation providing water service to passengers and crew

Aircraft Water System Operating Status, cont.

◉ Inactive Status

- **Passenger access to the water system must be prevented by**
 - (1) disconnecting or shutting off the water,
 - (2) preventing the flow of water through the tap(s);
 - (3) allowing water to be supplied only to lavatory toilets, and not to any lavatory or galley tap; or
 - (4) removing the aircraft from passenger service;
- **To avoid a violation being issued**
 - Aircraft water system must be identified in ARCS as “inactive” by the end of the compliance period in which the monitoring or disinfection and flushing requirement is due to be performed; AND
 - Any missed requirements must be performed prior to the aircraft water system serving water to the public

Compliance Oversight Responsibilities: EPA HQ and EPA Regions

● EPA HQ will...

- Develop national implementation documents and provide applicable training
- Manage and maintain the national ADWR website
- Manage and maintain the ADWR Reporting and Compliance System (ARCS)
- Provide technical assistance to air carriers
- Generate violations and develop compliance reports for EPA Region review

Compliance Oversight Responsibilities: EPA HQ and EPA Regions, cont.

- EPA Regions will:
 - Directly implement the ADWR for air carriers within their region
 - Serve as the primary program contact for air carriers
 - Provide compliance and technical assistance
 - Review ARCS compliance reports and provide follow-up action with air carriers
 - Determine and conduct enforcement actions
 - Conduct compliance audits as deemed necessary

NOTE: Jurisdiction is determined by the Region in which the air carrier is headquartered

Compliance Oversight Responsibilities: EPA HQ and EPA Regions

National ADWR website

water.epa.gov/lawsregs/rulesregs/sdwa/airlinewater/index.cfm

ADWR Reporting and Compliance System
(ARCS)

water.epa.gov/lawsregs/rulesregs/sdwa/airlinewater/reporting.cfm

Semler Industries'
Potable Water Cabinet

Operating Instructions

- A. Tighten the hand brake initially until there is enough drag
reel does not turn freely upon completion of the unwinding
- B. For aircraft water filling:
1. Turn the interior light on.
 2. Open the inlet water ball valve.
 3. Open the ball valve at the nozzle and flush the

B. For aircraft water filling:

1. Turn the interior light on.
2. Open the inlet water ball valve.
3. Open the ball valve at the nozzle and flush the hose for two minutes.
4. Close the nozzle ball valve.
5. Unwind the hose (manual operation only).
6. Connect dry-break nozzle to the aircraft.
7. Open the ball valve at nozzle and transfer water to the aircraft.
8. Close the ball valve at nozzle and disconnect nozzle from the aircraft.