

Memorandum



CITY OF DALLAS

DATE October 15, 2021

TO Honorable Members of the Environment and Sustainability Committee: Paula Blackmon (Chair), Paul Ridley (Vice Chair), Carolyn King Arnold, Adam Bazaldua, Jaime Resendez, Jaynie Schultz, Chad West

SUBJECT Responses to Questions Raised during the October 4th Briefing – Water Utilities Department

Dallas Water Utilities (DWU) is providing a series of briefings over the Fall of 2021 to provide background on DWU's history of providing regional services, operations, capital, and future needs. At the October 4, 2021 Environment and Sustainability City Council Committee Meeting, an overview of the Long-Range Planning efforts for water, wastewater, and stormwater was presented. Responses to questions asked during the briefing are provided in this memo.

What is the status of the City's efforts related to lead and copper in the supply system?

The City is regulated with respect to control of lead and copper in drinking water beginning with the 1991 EPA Lead and Copper Rule. The regulation of private lines, those that connect to the City's meter box and go into the house, is not included in the federal regulations, and is not addressed in programmatic efforts by the City.

The following facts and efforts are listed below:

- Dallas' source waters are not corrosive
- Lead is not present in Dallas service lines
- Corrosion inhibitor is added to the DWU process to prevent leaching of metals, including lead
- DWU has had no exceedance at the action level of 15 parts per billion (ppb) since testing has begun
- 2021 lead sampling indicated 90th percentile to be 0.0 ppb (Not Detected)

DWU is on a reduced Texas Commission on Environmental Quality (TCEQ) required monitoring plan due to previous test results for lead and copper. The reduced plan requires monitoring at 50 sites rather than 100 sites, and we do it every three years. Sampling is conducted at the customer's tap, usually the kitchen sink, after a period of not less than 6 hrs. of stagnation (per EPA instructions). All sampling sites contain copper plumbing, some with lead solder. Two sites are schools, and 48 sites are residential homes. All sites are pre-approved by TCEQ before sampling is conducted.

Residents can view available annual reports for drinking water quality at the following web page: https://dallascityhall.com/departments/waterutilities/Pages/water_quality_reports.aspx.

DWU is proposing to add two positions related to Water Quality in FY23 to address proposed changes to the Lead and Copper Rule.

What does "reuse" mean and what is it used for in Dallas? Is this used as part of our drinking water?

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Water Reuse generally refers to the process of using treated wastewater (reclaimed water) for a beneficial purpose. The degree of treatment depends on the proposed use for the water. There are two major categories of water reuse: direct reuse and indirect reuse. Both categories can be used for potable or non-potable purposes. An example of direct reuse for non-potable purposes is piping reclaimed water directly from the wastewater treatment facility to a power plant for cooling purposes. An example of indirect reuse for potable purposes includes diverting reclaimed water previously discharged into the lake or stream to be treated at a water treatment plant to drinking water quality standards prior to distribution as drinking water.

Dallas currently utilizes both direct, non-potable reuse and indirect, potable reuse:

- A portion of treated wastewater in Dallas is transported via pipeline to Cedar Crest and Stevens Park Golf Courses for irrigation. During Fiscal Year 2019-20, DWU transported approximately 3.5 million gallons of treated wastewater to the two golf courses.
- Dallas has a water right to reuse Dallas' Central and Southside Wastewater Treatment Plant discharges and the discharges from the Town of Flower Mound and City of Lewisville wastewater treatment plants. During Fiscal Year 2019-20, DWU diverted 5.3 billion gallons of treated wastewater discharges from the Elm Fork of the Trinity River and treated this water to drinking water quality standards for distribution. There are multiple wastewater discharges in the watershed of each of Dallas' water supply reservoirs, therefore, treated wastewater effluent has been incorporated into Dallas' water supplies for decades. The "reuse" designation only applies to reclaimed water that has an associated water rights permit.

Is the water treatment process adequate for PFAS removal or other? What is our responsibility? What is regulated?

While the City of Dallas drinking water treatment processes meets or exceeds all regulatory requirements, they do not remove Per- and Polyfluorinated substances, also referred to as PFAS. PFAS are a group of man-made chemicals used primarily in consumer products to make them non-stick and water resistant. Unfortunately, the characteristics that make them useful are the reason they persist in the environment and build up, in our bodies and the bodies of animals.

There are currently no federal regulatory compliance standards for PFAS chemicals. The US EPA is initiating steps to evaluate the need to develop a standard and included PFAS in the Third Unregulated Contaminant Monitoring Rule (UCMR3). Dallas is obligated to participate in the UCMR3 monitoring effort, in which water samples from representative sites within our water system are analyzed for PFAS.

The EPA has issued a health advisory for two PFAS chemicals which describes non-regulatory concentrations of drinking water contaminants at, or below which, adverse health effects are not anticipated to occur over specific exposure durations. The US EPA established a health advisory level of 70 parts per trillion. At levels above 70 parts per trillion, water systems are expected to investigate further and promptly notify their State drinking water regulatory agency.

In September 2021, DWU conducted UCMR3 monitoring. All but two DWU sites reported 'non-detect' for PFAS chemicals. The exceptions included the Bachman WTP Tap sample which

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tested positive for Perfluorohexanoic acid (not one of the two with a health advisory) at a level of 9.83 parts per trillion. The second sample from Lake Tawakoni tested positive for Perfluorooctanesulfonic acid at a level of 12.2 parts per trillion. In this instance, the analysis results are far below the established health advisory.

Although DWU treatment strategies are designed to address regulatory compliance standards, we are continuously evaluating constituents of emerging concerns to determine if they are present in our waters, and if so, at what levels, and if necessary due to changing regulations, develops steps to address such constituents.

What is the approach to address Stormwater capital needs? Short term, long term, debt and potential infrastructure bill or other?

Stormwater capital needs are currently addressed through the City’s Bond Program and a small pay-as-you-go capital program. A 5-year capital improvement plan is updated every year as part of the department’s budgeting process. A portion of stormwater rates are used for pay-as-you-go financing of the capital improvements identified in the 5-year plan. Pay-as-you-go financing is not sufficient to keep pace with capital needs to maintain existing infrastructure and make necessary improvements to protect property and the public from flooding.

The long-term solution is to build an adequately sized and sustainable capital program. This will be accomplished by issuing debt and financing capital costs similar to the way the water and wastewater side of the utility operates. In the short term, DWU is prepared to apply for and use any available infrastructure bill funds or other government appropriations to help deliver eligible projects. We will also complete master planning efforts to determine the appropriate size capital program and create a roadmap for getting there. This initial planning effort is underway in the form of a comprehensive storm drainage assessment that is anticipated to be completed within the next 12-15 months.

With this roadmap, the utility will need to make sure adequate stormwater fees are being collected each year to appropriately fund a sustainable capital program. Low interest loan programs (and in some cases grants) offered by state and federal agencies will also be pursued as appropriate to deliver projects in the most efficient and economical manner.

If you have any questions, please contact Terry Lowery, Director of Dallas Water Utilities.



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