

Revised Arsenic Drinking Water Standard

Following is a summary of key information for manufactured home community owners for compliance with the new arsenic drinking water standard.

What is the new rule?

Effective January 23, 2006 the limit for arsenic in drinking water will be reduced from 50 parts per billion (ppb) to 10 ppb. The limit is established by EPA and enforced by the States.

Testing must be performed every 3 years for groundwater systems and every year for surface water systems.

Who does the rule apply to?

The new requirement applies to all *Community Water Systems (CWS)* and *Non-Transient Non-Community Water Systems (NTNCWS)*. It does not apply to *Transient Non-Community Water Systems (TNCWS)*.

- *Community Water System (CWS)*: A public water system that supplies water to the same population year-round.
- *Non-Transient Non-Community Water System (NTNCWS)*: A public water system that regularly supplies water to at least 25 of the same people at least six months per year, but not year-round. Some examples are schools, factories, office buildings, and hospitals which have their own water systems.
- *Transient Non-Community Water System (TNCWS)*: A public water system that provides water in a place such as a gas station or campground where people do not remain for long periods of time.

The rule may apply to a community if:

- It provides water from its own ground or surface source
- It currently treats and tests water
- It provides residents with an annual Consumer Confidence Report

It probably does not apply to a community that receives its water from a municipal system that does its own monitoring (exceptions may apply if the community re-sells water through sub-metering – this will depend on the State).

What if my community does not meet the standard?

There are three basic options:

1. Secure an alternate water source that meets the standard
2. Partner with a nearby water system to blend water such that the combined water meets the standard
3. Install treatment

What about treatment options?

A list of service providers offering arsenic treatment is available from the American Water Works Association via their website's buyer's guide at <http://www.awwa.org/buyersguide/member.cfm>. The AWWA site lists approximately 20 firms that offer arsenic water treatment systems.

Seven companies provided information to MHRA. This information, and links to their websites may be found on MHRA's website at <http://www.mhrahome.org/pages/arsenic.htm>.

Generally, the responses indicated that:

- Systems to treat arsenic are available now across the US and Canada
- Treatment levels are adequate. Many systems have no upper limit on treatable influent level.
- Capacities range from 10 to 10,000 gallons per minute.
- Costs for installation range from \$100,000 to \$200,000 (depending on level of automation and existing water quality, among other things).
- Operation costs range from a \$2,000 to \$50,000 per year depending on system flow.
- Byproducts of the treatment are typically considered non-hazardous.
- Operator skill with automated system is designed to be low.

Key issues to consider when investigating a treatment vendor:

- How automated do you want system? The cost will vary based on this factor.
- Do you want a company that can provide a turnkey solution and ongoing service – or simply install the equipment?
- Understand all the costs: equipment, engineering, installation, construction of facilities to house the system, start-up/commissioning, filter media, chemicals, disposal, and operation labor.
- The systems surveyed are municipal-grade systems. Much cheaper systems of the type used in restaurants are also available but likely do not have adequate capacity or longevity and may have higher operating costs.

What is the impact on MH Communities in general?

EPA estimates that 3,024 CWSs and 1,080 NTNCWSs will require treatment (out of a total of 54,064 CWSs and 19,738 NTNCWSs nationally). Therefore it is likely that some manufactured home communities will be affected.

MHRA polled NCC members regarding their arsenic treatment needs and strategies, if any. Many, but not all, community owners contacted were familiar with the new requirements. Very few believed they needed treatment, either because their communities used municipal water, or because they met the new standard.

Where can I get more information?

- MHRA has established a web page at <http://www.mhrahome.org/pages/arsenic.htm> to provide information on arsenic treatment options to NCC members.
- EPA offers information on the new standards and guidance on compliance at <http://www.epa.gov/safewater/arsenic.html>.
- EPA's publication: *Complying With the Revised Drinking Water Standard for Arsenic: Small Entity Compliance Guide* is available at both websites.
- Your state's environmental office may be able to help.