chenieredrew
WATER SYSTEM

Customers Serving Customers

CERTIFIED MAIL # 7018 1130 0000 8004 1721 – Return Receipt Requested

June 10, 2019

LDHH, OPH, Engineering Services
Attn: Sean Nolan, DBP Program Coordinator
PO Box 4489
Baton Rouge, LA 70821-4489

RE: Cheniere Drew South Water Supply (LA1073099)
Stage 2 Disinfection By-Products Rule (DBP2)
2019 Second Quarter Operational Evaluation Level (OEL) Report

Dear Mr. Nolan:

According your letter dated January 19, 2018, the Cheniere Drew South Water Supply must begin operational evaluation level (OEL) calculations to determine whether an OEL report is required for any of its Stage 2 DBP sample sites. According to my calculations an OEL Report is required for LA1073099 BDP02 – 1206 Puckett Lake Road. Attached is the required report for the above mentioned site.

As detailed in Section E Additional Information of the Report, the CDWS Board of Directors has had its consulting engineer prepare and submit plans to LDHH for Re-Circulation / Aeration Facilities at the two elevated storage tanks for this water supply. Plans have been approved by LDHH Permit No. 18-08-073-015. As of this date construction has been completed at the Camp Road Site and the Miller Shelby Road Site is under construction. DBP samples collected in 1st Quarter 2019 at all collection sites were within compliance levels. DBP samples collected for 2nd Quarter 2019 were not as favorable at the DBP02 – 1206 Puckett Lake Road sampling location.

Should you desire additional information do not hesitate to contact my office.

Respectfully submitted;

John D. Nichols
Operations Manager

Attachments

646 COMMERCIAL PARKWAY | P.O. BOX 35888 | WEST MONROE, LA 71294
www.cdws.org | (318) 322-9516

Site Location: DBP02 - 1206 Puckett Lake Road OEL Report Period: 2Q2019 (*e.g.* 1Q20??)

For Example: DBP01- 123 Main Street (A separate OEL must be submitted to the State for each location that exceeds the OEL for TTHM and/or HAA5.)

Stage 2 Disinfectants and Disinfection Byproduct Rule

Operational Evaluation Level & Report

PWS Name Cheniere Drew South Water Supply PWS ID # LA1073099

For calculating the OEL, Quarter 1 and Quarter 2 correspond to the quarters prior to the current quarter (Quarter 3)

Operation Evaluation Level (OEL) Calculation				
Total Trihalomethanes (TTHMs) – MCL = 80 ppb (0.080 mg/L)				
Quarter 1	Quarter 2	Quarter 3	OEL = (Q1+Q2+2*Q3)/4	OEL exceeds 80?
78.5	46.3	142.0	(78.5+46.3+2*142.0)/4=102.2	Yes
Haloacetic Acids – Five (HAA5) – MCL = 60 ppb (0.060 mg/L)				
Quarter 1	Quarter 2	Quarter 3	OEL = (Q1+Q2+2*Q3)/4	OEL exceeds 60?
55.8	24.9	71.3	(55.8+24.9+2*71.3)/4=55.825	No
OEL example for Total Trihalomethanes:				
Quarter 1	Quarter 2	Quarter 3	OEL = (Q1+Q2+2*Q3)/4	OEL exceeds 80?
81	79	83	(81+79+2*83)/4 = 81.5	Yes

If the TTHM or HAA5 OELs exceeded the MCLs, fill this form out to the best of your ability and submit it to the State no later than 90 days after the exceedance. Explanations may need additional documentation. Make sure all documentation includes your PWS ID on each page.

A. Source & Source Quality		
1. Have your source practices changed? e.g., changed well pumping depth, well rehab, changed intake depth or changed intake structure, changed pumping rates or pumping times and frequency, etc.	☐ Yes	☑ No
2. Have you changed/added sources? e.g., turned on emergency sources, drilled new well, changed/added purchase connection, etc.	☐ Yes	☑ No
3. Have you seen changes in source water quality? e.g., turbidity, pH, temp, alkalinity, hardness, drought conditions, heavy rain, changes in animal feed lots, agricultural practices, etc. Surface water systems should also consider algae blooms, fires in source water (protection) areas, increased filter changes or number of backwash cycles required.	☐ Yes	☑ No
If you answered "**YES**" to any of the questions above (Section A), please explain:		

B. Treatment		
1. Have you changed the amount or type of disinfectant? e.g., chlorine to chloramines, increase/decrease disinfectant dosage, etc.	☑ Yes	☐ No
2. Have you changed or added locations of disinfectant points?	☐ Yes	☑ No
3. Other than disinfection, have you changed or made additions to any treatment processes?	☐ Yes	☑ No
4. Have you made changes to any other chemical applications? e.g., change any chemicals (change coagulant type), changes in application points, changing dosage of any chemical, etc.	☐ Yes	☑ No
If you answered "**YES**" to any of the questions above (Section B), please explain:		

Increased chlorine dosage in order to maintain a 0.5 mg/L residual throughout the distribution system as required for compliance with the Emergency Rule.

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PWS Name Cheniere Drew South Water Supply PWS ID # LA1073099

C. Distribution System Operations		
1. Have you added additional service connections (industry or residential)? e.g., adding additional pipes or annexing additional areas of service which could change residence times	☐ Yes	☑ No
2. Have you experienced significant increases or decreases in water demand? e.g., drought restrictions, industry opening/closing, population change	☐ Yes	☑ No
3. Has additional piping created new loops or dead-ends?	☐ Yes	☑ No
4. Does your storage tank fill and drain from the bottom (potentially causing stagnation at the top)?	☑ Yes	☑ No
5. Has the residence time of your tank(s) increased or decreased? i.e., are tanks being filled/drained more or less often?	☐ Yes	☑ No
6. Have you had frequent line breaks or major construction in your distribution system?	☐ Yes	☑ No
7. Do you purchase water that has no disinfectant or a different disinfectant than what you currently use? e.g. you purchase water with chloramines and you add chlorine	☐ Yes	☑ No
8. Do you have areas where disinfectant residual levels are below the State minimum required?	☐ Yes	☑ No
9. Have you had significant changes in chlorine demand to maintain residuals?	☐ Yes	☑ No
10. Have you changed your distribution flushing procedures?	☐ Yes	☑ No
11. Have you had any changes in treatment that occur in distribution? e.g., changes in booster chlorination or amounts?	☐ Yes	☑ No
12. Have you had an increase in customer complaints?	☐ Yes	☑ No

If you answered "**YES**" to any of the questions above (Section C), please explain:

The Miller-Shelby Road Elevated Tank fills from the top and empties from the bottom. The Camp Road Elevated Tank fills from the bottom and empties from the bottom. Under Permit No. 18-08-073-015 the Camp Road Elevated Tank will be piped to fill from the top and empty from the bottom. We completed construction at the Camp Road Site in January 2019.

D. Additional Questions		
1. Do you have tank management/operational procedures? e.g., cleaning schedule, set operational levels of your tank (high and low), etc?	☑ Yes	☐ No
2. Can you allow the tank(s) to drain lower to flush out "older" water?	☑ Yes	☐ No
3. Can you reduce chlorine/chloramine dosage and still maintain required residuals in distribution?	☐ Yes	☑ No
4. Do you have a flushing program?	☑ Yes	☐ No
5. Does your purchase contract require that water being delivered meets all Federal Standards, including DBPs?	☐ Yes	☑ No
6. Does your contract allow for a flushing credit?	☐ Yes	☑ No
7. Can you work with your seller system to optimize water age, reducing DBP formations?	☐ Yes	☑ No

If you answered "**NO**" to any of the questions above (Section D), please explain:

#3 - We strive to maintain a 1.0 to 0.8 mg/L free residual leaving our tank sites (POE's). It requires these levels to insure compliance with the Emergency Rule requirements. #5,#6,#7 Does not apply as CDWS does not purchase water from other sources.

PWS Name Cheniere Drew South Water Supply PWS ID # LA1073099

E. Additional Information

Please explain what steps you could take to minimize future formations. e.g., changes in treatment, distribution, etc. The Cheniere Drew South Water Supply (LA1073099) submitted plans to LDH for Re-Circulation / Aeration Facilities at its Camp Road and Miller-Shelby Road water production and storage sites. These plans were approved by LDH on June 11, 2018 under Permit No. 18-08-073-015. The project has been bid, contracts accepted, and notice to proceed issued. Work is complete at the Camp Road site. The Miller-Shelby Road site is nearing completion with an estimated completion date of July 1, 2019. It is our belief that these improvements will reduce disinfection byproducts to levels below the established MCL's. First Quarter 2019 sample results for DBP at all sites were well below the MCL limits: DBP02 TTHM's = 46.3 ug/L, HAA5's = 24.9 ug/L; DBP03 TTHM's = 35.3 ug/L, HAA5's = 18.8 ug/L. Second Quarter 2019 sample results for DBP for all sites were not as favorable with results for DBP02 TTHM's = 142.0 ug/L, HAA5's = 71.3 ug/L and DBP03 TTHM's = 33.6 ug/L, HAA5's = 16.5 ug/L. Please note that during sampling for 2019 Camp Road was operational for both Quarters. For the 2nd Quarter of 2019 the Miller-Shelby well and elevated tank were operational without recirculation / aeration. If the recirculation / aeration facilities as permitted are unsuccessful to bringing DBP levels within MCL's, the CDWS Board of Directors will solicit plans and permits for the additional carbon absorption vessels as an additional method of treatment similar to existing facilities under the Cheniere Drew Water System umbrella on a per site basis.

I certify that the information in this entire report, including any attachments, is true and accurate to the best of my knowledge. I acknowledge that any knowingly false or misleading information may be punishable under Louisiana Revised Statue 14:133 and other applicable laws.

Signature: _____ Date: 10 - June - 2019

Printed Name: John D Nichols, Operations Manager

Contact Phone Number: (318) 322-9516

Send the completed report to LDHH-OPH, Central Office no later than 90 days after the operational evaluation level (OEL) exceeds the MCL for either TTHMs or HAA5.

Mail: LDH – OPH, ENGINEERING SERVICES
P.O. BOX 4489
BATON ROUGE, LOUISIANA 70821-4489

Fax: Attn: DBP Manager at 225-342-7303