

**Water Audit
Regulatory Panel Advisory (RAP) Meeting #3**

**Thursday, July 21, 2022
Third Floor Conference Room
DEQ Central Office
1111 East Main Street
Richmond, Virginia 23219**

Start – 10:00 AM

Attendees:

- RAP Members
 - Drew Blackwell, Cavanaugh & Associates
 - Steve Herzog, Hanover County Public Utilities
 - Alan Johnson, City of Danville Water & Wastewater
 - David Jurgens, City of Chesapeake Public Utilities
 - Michael Kearns, Sussex Service Authority
 - Bill Mawyer, Rivanna Water and Sewer Authority
 - Jennifer Rogers (Dominion Energy), Virginia Manufacturers Association
 - Julie Shortridge, Virginia Tech
 - Andy Crocker, SERCAP
- DEQ Staff
 - Jutta Schneider, Director, Division of Water Planning
 - Scott Kudlas – Director, Office of Water Supply
 - Brandon Bull – Water Policy Manager
 - Elizabeth Gallup – Guidance & Regulation Coordinator, Water Planning Division
- Members of the Public
 - Traci Goldberg, Fairfax Water

Welcome and Introductions:

Scott Kudlas opened and welcomed everyone to the third meeting of the Water Audit RAP. He followed with an overview of the agenda and a review of the discussion during the last meeting.

RAP members and DEQ staff introduced themselves.

Groundwater Proposed Regulation Discussion:

Ms. Gallup reviewed the changes to the proposed regulation definitions made since the previous RAP meeting. Members asked clarifying questions and discussed the need to add language regarding metered locations to the definition for water loss audit. The committee members also agreed to strike the definition for water balance and instead create a definition for water loss to be used by all groundwater user types. Consensus was reached on the definitions section of the regulation and the committee moved on to discuss the specifics of the water audit plan requirements.

Mr. Kudlas presented the water audit and leak detection and repair plan amendments to the regulation and reviewed what the committee discussed at the last meeting. The discussion began with a focus on public water supply. RAP members weighed in regarding requiring annual audits to be submitted on a yearly basis versus requiring annual audits that are reported every three years. After considering the impact of the options on small systems versus larger systems, consensus was reached for the requirement of annual audits to be submitted to DEQ every three years.

Turning to the proposed regulation requiring the use of the AWWA water loss audit software, RAP members discussed the possibility of adding the use of an alternative methodology. While some members were in agreement with requiring all public water supply systems to use the AWWA software, others suggested that the regulation should allow the use of an alternative method provided it estimated water loss in the system. RAP members agreed to add a definition of water loss to the definitions section in order to set parameters around the use of an alternative audit methodology. At this point the committee was in agreement about what methodology water audit plans must use.

The committee moved on to discussing water audit requirements for commercial and industrial users. Discussion centered on the differences in infrastructure and technology used by commercial and industrial users compared to public water supply. RAP members agreed that yearly audits may not be necessary for these users, and the agreed upon reporting requirement for water audit plans landed on one water loss audit to be submitted every three years.

Moving on to agricultural users, the discussion focused on the differences in the ways these users retain data compared to the users described above. Suggestions were made to provide a template for agricultural users and to consider flexible reporting tied to withdrawal reporting. RAP members agreed upon the requirement for annual audit reports to be reported every three years.

Finally, RAP members were directed back to the development of leak detection and repair plans. The group's discussion focused on the language in the proposed requirements of the leak detection and repair plans. The group chose to focus on using submitted water audit data to inform the prioritization of actions to address water loss.

At this point RAP members were in agreement about the revisions to the proposed regulation and Mr. Kudlas opened the floor for public comments.

Public Forum:

One member of the public was present. Ms. Goldberg stated that definitions are important and expressed concern that if water loss definitions evolve in the future there is concern over interpretation. She also suggested that the committee loosen the relationship between the water audit and leak detection and repair plans, and that the leak detection and repair plans could stand on its own merits.

Next Steps:

The RAP reached consensus on the proposed groundwater regulations at today's meeting and will discuss proposed surface water requirements for water audit plans and leak detection and repair plans at the next meeting. Mr. Kudlas asked if there are any charges for DEQ staff ahead of the next meeting adding that Mr. Harris, who was not present, provided comments ahead of today's meeting suggesting

the group should not require the AWWA water audit software in the surface water regulations. The group agreed that the changes made today are sufficient to address his comments ahead of the next meeting.

It was also noted that several RAP members made a request for an alternative date for the next, and likely final, meeting so they can participate.

Meeting ended at 3:05pm

Next Meeting:

Scheduled for Tuesday, August 23, 2022 at Central Office.

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