

SUMMARY OF COMMENTS
A NEW VISION FOR CLEAN, SAFE DRINKING WATER
LISTENING SESSION
US EPA Seventh Annual Drinking Water Workshop:
Small Drinking Water Systems: Compliance Strategies
Cincinnati, OH
August 11, 2010

BACKGROUND

On August 10, 2010, EPA's Office of Ground Water and Drinking Water (OGWDW) provided an overview of the new Drinking Water Strategy and on August 11, 2010 OGWDW participated in a listening session as part of an effort to foster an open dialogue about the Drinking Water Strategy and to hear from the public and stakeholders their thoughts on how the Agency should proceed and implement the Drinking Water Strategy.

Approximately 25 people attended the session which was held during the Seventh Annual Workshop on Small Drinking Water System Compliance Strategies. The workshop was sponsored by the EPA's Office of Research and Development (National Risk Management Research Laboratory), in cooperation with the Association of State Drinking Water Administrators (ASDWA), and took place in Cincinnati, Ohio.

Here is a summary of the ideas that the attendees shared with the staff about what EPA should consider when considering actions to address groups of contaminants. Also included in this summary is a list of issues/challenges that the attendees believe the EPA could face as it prepares to move forward with the new strategy.

Also included in this summary is a list of suggestions offered by the attendees about methods/approaches that the EPA should consider as part of the new Drinking Water Strategy to make source water protection a more robust aspect of Safe Drinking Water Act (SDWA).

CONTAMINANT GROUPS

Attendees suggested that the contaminants be grouped as follows:

- Based on common treatment techniques

- Based on common chemical properties

- Using a two-tier approach, based first on chemical properties which will then be placed on sub-categories based on treatment techniques

- Based on contaminants which are identified as prevailing in the distribution systems

- Based on chronic contaminants vs. acute contaminants

- Based on man-made manufacturing activities of contaminants and/or its uses (localized regulation aimed at source water protection)
- Based on parent contaminants and its degradates
- Based on surrogates as indicators for groups of contaminants
- When grouping the EPA should consider contaminant co-occurrence
- EPA should look at the cumulative effect of contaminants on target organs
- When grouping contaminants the EPA should consider including contaminants currently being regulated as candidates for new groups

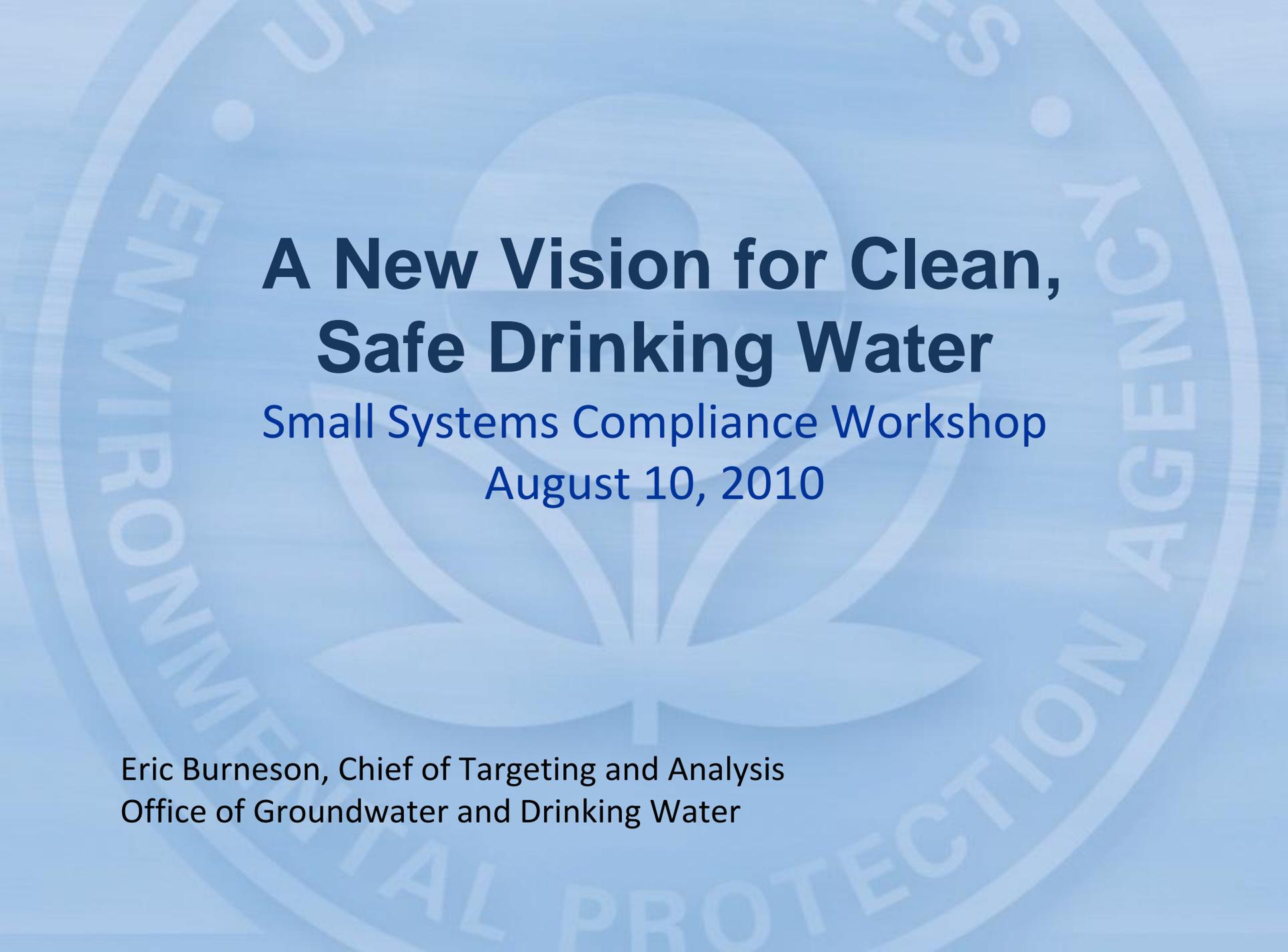
OTHER METHODS/APPROACHES

- Place more emphasis in source water protection, using the leverage provided by the statutory authorities of the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA)
- Using a multi-barrier approach
- Instead of placing regulations on water systems the EPA should consider placing these regulatory restrictions on the industries that generate the contaminants. In other words contaminants should be addressed at their points of production, to adequately protect drinking water sources. (e.g. pharmaceutical companies should remove contaminants from their waste streams instead of having the water systems pay for its removal)
- Regulate the manufacturing industry as a means to protect drinking water sources
- Remove contaminants from publicly-owned treatment works (POTW) streams as part of the Clean Water Act
- EPA should use the approach type of regulating-by-industry

POSSIBLE CHALLENGES

- Lack of analytical methods to detect contaminants at low concentrations could be a technical challenge
- Limitations of available treatment technologies to remove contaminants could be a challenge for certain contaminants groups
- Handling and disposal of treatment waste streams could pose technical and economic challenges as well as worker protection issues

- EPA should consider the tremendous difficulty that regulating groups of contaminants will present, due to the previous experiences the water systems' staff has had when dealing with single contaminants.
- The EPA should consider if the benefits provided to public health justifies the costs associated with water treatment



A New Vision for Clean, Safe Drinking Water

Small Systems Compliance Workshop

August 10, 2010

Eric Burneson, Chief of Targeting and Analysis
Office of Groundwater and Drinking Water



Drinking Water Strategy

- Address contaminants as groups rather than one at a time.
- Foster development of new drinking water treatment technologies.
- Use the authority of multiple statutes to help protect drinking water.
- Partner with states to share more complete data from monitoring at public water systems.



Goals for the New Vision

By pursuing these actions, EPA will:

- Provide more robust public health protection in an open and transparent manner.
- Assist small communities to identify cost and energy efficient treatment technologies.
- Build consumer confidence by providing more efficient sustainable treatment technologies to deliver safe water at a reasonable cost.

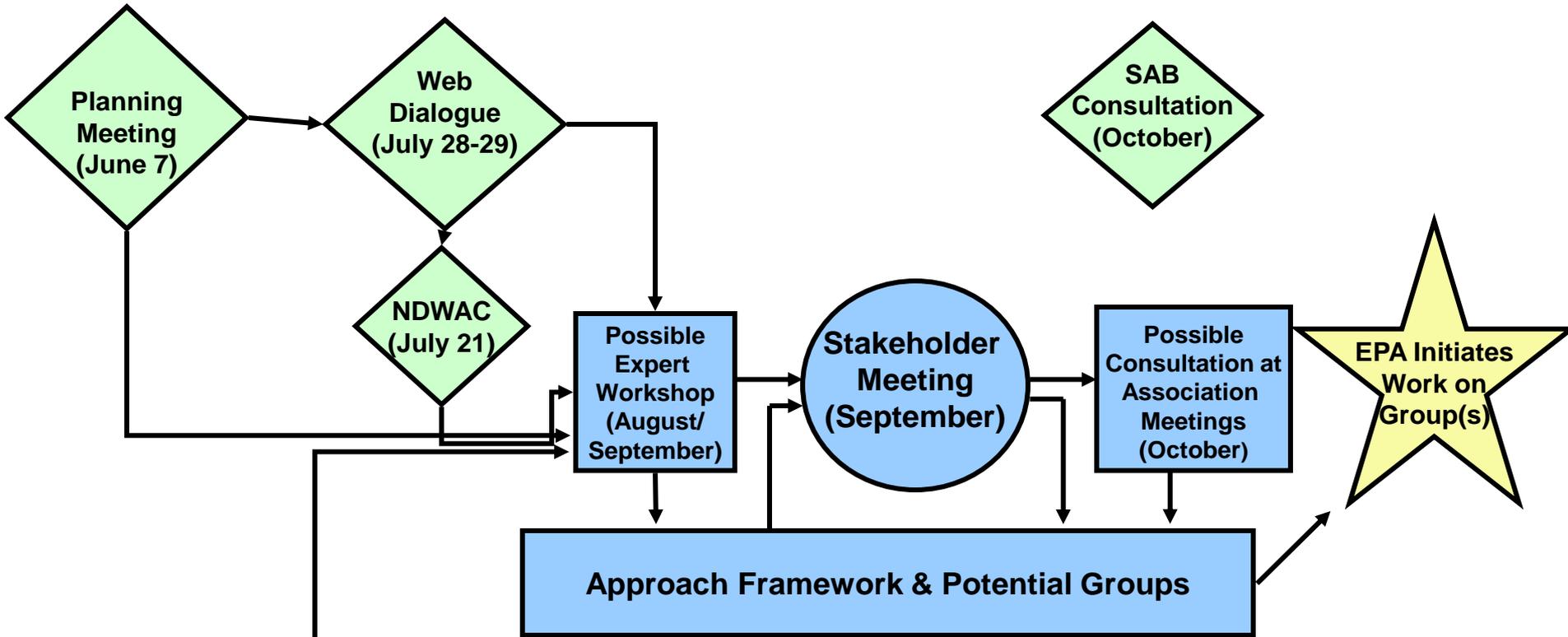


Address Contaminants as Groups

- Engage stakeholders and the public to develop technical and procedural approaches.
 - Planned outreach activities through the summer.
 - Host web-based discussion forums within the next month.
 - Share initial EPA ideas and get your ideas.
- Use ideas and approaches to address contaminants as groups to develop a framework.
- Use framework to address groups of similar contaminants to develop drinking water regulations.



Outreach on the Drinking Water Strategy



Listening Sessions

(June 21: Chicago, IL)
AWWA ACE

(Aug 11: Cincinnati, OH)

(Aug 16: Washington, DC)

(Aug 19: Rancho Cucamonga, CA)

→ EPA 7th Annual DW Workshop

→ Region 3/PRB DWSPP

→ Region 9/CA-NV AWWA Section

Light blue boxes will focus on groups



Develop New Technologies

- Foster development of new drinking water technologies to:
 - Address health risks posed by a broad array of contaminants.
 - Control contaminants that confront utilities today and into the future.
 - Provide sustainable safe drinking water at reasonable costs
 - Develop water- and energy-efficient treatment technologies
- Collaborate with universities, technology developers, and the private sector.



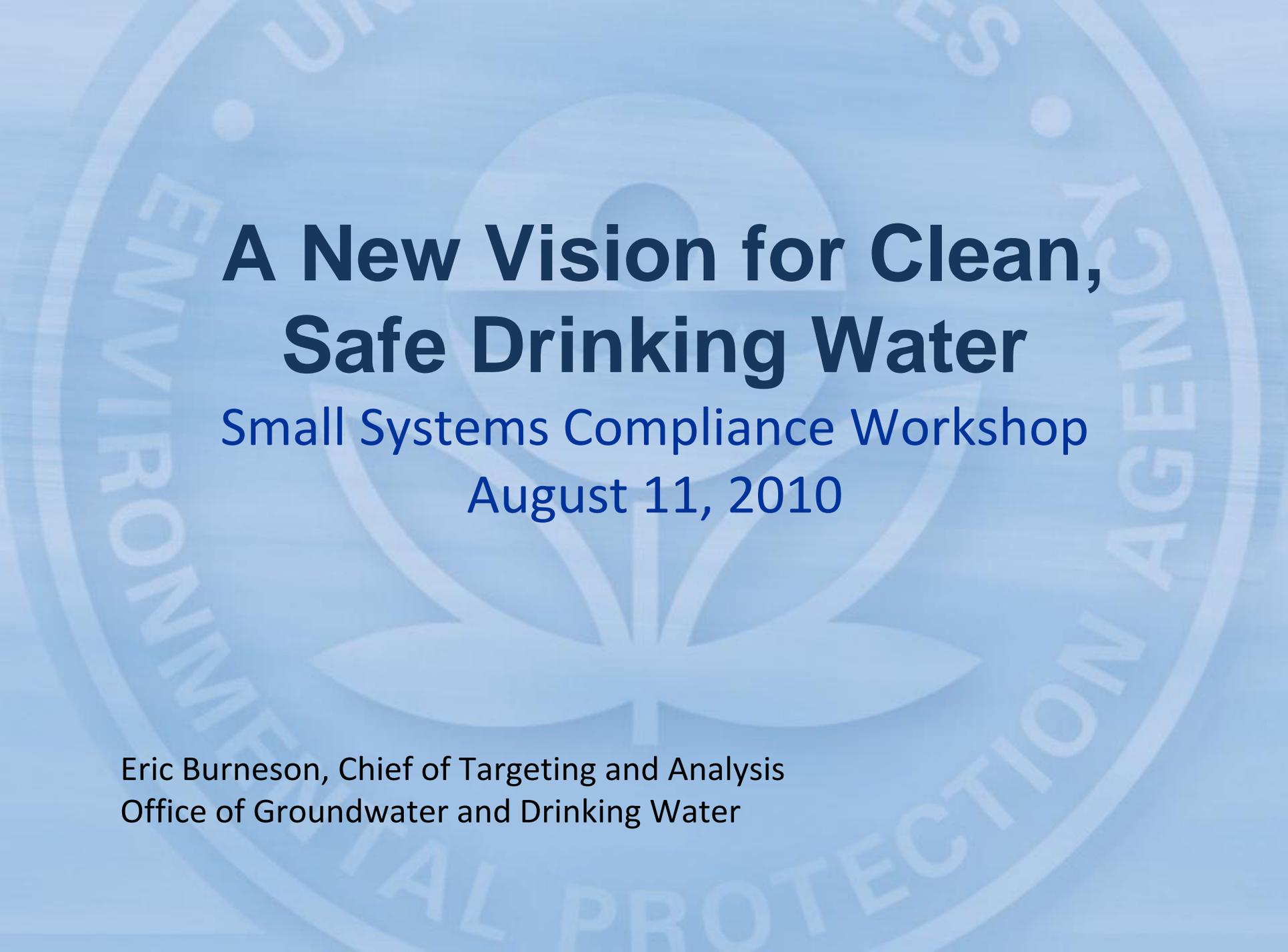
Use Other Authorities

- Identify opportunities to better understand and improve drinking water quality.
- Provide relevant health effects and exposure data.
- Ensure that decisions made under other authorities are protective of drinking water.
 - Use reviews under the Federal Insecticide, Fungicide, Rodenticide Act (FIFRA) to tighten pesticide registration requirements when occurrence data approaches or exceeds levels of concern.
 - Use the Toxic Substance Control Act to ensure that decisions made for new and existing industrial chemicals are protective of drinking water.



Share Access to All PWS Data

- Partnering with states to develop shared access to all public water systems monitoring data.
- Developing information technology, data analysis, and communication tools with states to:
 - Target public health issues, conduct program oversight, and provide compliance assistance.
- Provide timely information about the quality of drinking water and performance of drinking water systems.



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Address Contaminants as Groups

- What are some potential approaches for addressing contaminants as groups?
- What are some factors that EPA should consider in deciding what makes a good group?
- What are the key (2-3?) technical challenges?
- What are the key (2-3?) implementation challenges?
- Can you provide examples of contaminant groups (2-3?) that may present a meaningful opportunity to protect public health and reduce risk?