

SUMMARY OF COMMENTS
A NEW VISION FOR CLEAN, SAFE DRINKING WATER
LISTENING SESSION
US EPA Region 9 & American Water Works Association's California/Nevada Section
Rancho Cucamonga, CA
August 19, 2010

BACKGROUND

On August 19, 2010, EPA participated in a listening session on the Agency's new Drinking Water Strategy. As announced by U.S. EPA Administrator Lisa P. Jackson in March 2010, the Agency is seeking a new approach to expand public health protection for drinking water by identifying better ways to address contaminants in groups, improve drinking water technology, utilize the authority of multiple statutes for protection, and to improve information exchange between EPA and state/local partners.

The purpose of this listening session was to hear from the public and stakeholders their thoughts on how the Agency should proceed and implement the Drinking Water Strategy, specifically on the topic of addressing contaminants as groups. This summary provides the questions and comments provided by the audience.

INTRODUCTION

The listening session was organized by EPA Region 9 and hosted by the American Water Works Association's California/Nevada (AWWA CA/NV) Section office located in Rancho Cucamonga.

Corrine Li and Bruce Macler of EPA Region 9 opened the meeting, thanked Phil Bren (Chair) and Beth King (Executive Director) of the AWWA CA/NV Section for hosting the listening session and welcomed the participants.

Approximately 30 participants were present in Rancho Cucamonga and approximately 12 participants were on teleconference.

Mr. Macler introduced Mr. Eric Burneson.

DRINKING WATER STRATEGY: A NEW VISION FOR CLEAN, SAFE DRINKING WATER

Eric Burneson (Chief of Targeting & Analysis Branch, Standards & Risk Management Division, Office of Ground Water and Drinking Water, US EPA) added his welcome, and appreciation to the host and participants for attending. Mr. Burneson provided an overview of the Drinking Water Strategy and the outreach process of engagement and next steps.

The goal of the drinking water strategy is to strengthen drinking water protection by building on scientific advances in technology, encouraging innovation, using existing authorities more effectively, and accessing more data from public water system monitoring. Mr. Burneson summarized each of the four principles, elaborating particularly on the 1st principle, "Address contaminants as a group rather than one at a time so that

enhancement of drinking water protection can be achieved cost-effectively,” which was the focus of the meeting.

Participant Comment to Overview

During the overview presentation of the goals for the new vision, a commenter questioned why EPA believes that they need to pursue building consumer confidence. The commenter questioned whether EPA had validated or measured the consumer confidence, or was there a measurement mechanism in place. The commenter expressed that their system’s consumer confidence was measured and was positive.

Questions:

EPA provided over-arching questions to the audience for discussion. The questions were the following:

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

Participant Responses/Comments

Question 1: Potential Approaches for Addressing Contaminants as Groups

- Treatment Technologies: Grouping contaminants by treatment technology. One commenter provided examples such as ozone oxidation, chlorine oxidation, and granular activated carbon. Another commenter suggested the concern regarding treatment by-products and the need to pay attention to the risk-risk trade-offs.
- Analytical Capabilities: Grouping contaminants by analytical capability.
- Source Water functions: Grouping contaminants by source water function. Commenter suggested by agriculture or by waste water treatment facility source water.
- Health Effects: Grouping contaminants by common health effect. Commenter suggested that more information was needed to better understand the health effects of grouping contaminants. For example, do the contaminants in the group behave synergistically or cumulatively? In addition, commenter indicated that grouping by end-point may be a possibility, but could be very challenging due to different treatment options, analytical capabilities or source water.
- Commenter suggested evaluating risk on a public health basis rather than on a chemical basis. Additionally, assessing the prevalence of all adverse health end points and identifying the subsets that are associated with drinking water (e.g.

bladder cancer). Then, if it is concluded that the attributable risk from drinking water for this adverse effect is a meaningful opportunity then address the groups that increase the risk.

- Cumulative risk assessment should include relative exposure and contributor sensitivity.
- Database need. Commenter suggested a need for an incident database (i.e. illnesses, occurrences) for regulated and emerging contaminants to better communicate public health priorities with the public.
- Research and evaluate other countries on how they approach or address similar issues.
- One commenter suggested that if focused on one factor (i.e. analytical capability, treatment) there is a risk of overlooking something else. Additionally, there is a need to consider all and look beyond what is known.

Question 2: Factors in Deciding Groups

- Comments from Question 1 that should be considered:
 - Treatment
 - Analytical Capability
 - Source Water
 - Health Effects
- A commenter suggested the need to think of the unknowns.
- The use of indicators and surrogates for contaminant groups and treatment.
- A Commenter suggested keeping in mind the resource and research support costs that could be incurred by the system when developing the new regulations.
- Consider occurrence and the grouping of persistent chemicals or chemicals with similar behaviors.
- The group of contaminants as a whole should have an aggregate risk.
- A Commenter suggested that there is a need for more fundamental health data.
- A consistent use of risk goals.
- The reason for grouping certain contaminants should be transparent.

Question 3: Technical Challenges

- One commenter asked: What would be the measuring tool for the contaminant groups? (i.e. log removal, surrogate).

- Health effects and the cumulative risk should be considered when grouping contaminants. Another commenter questioned how to aggregate risk.
- The outcome of the group's determination should be simple and easy to implement, especially for the small systems.

Question 4: Implementation Challenges

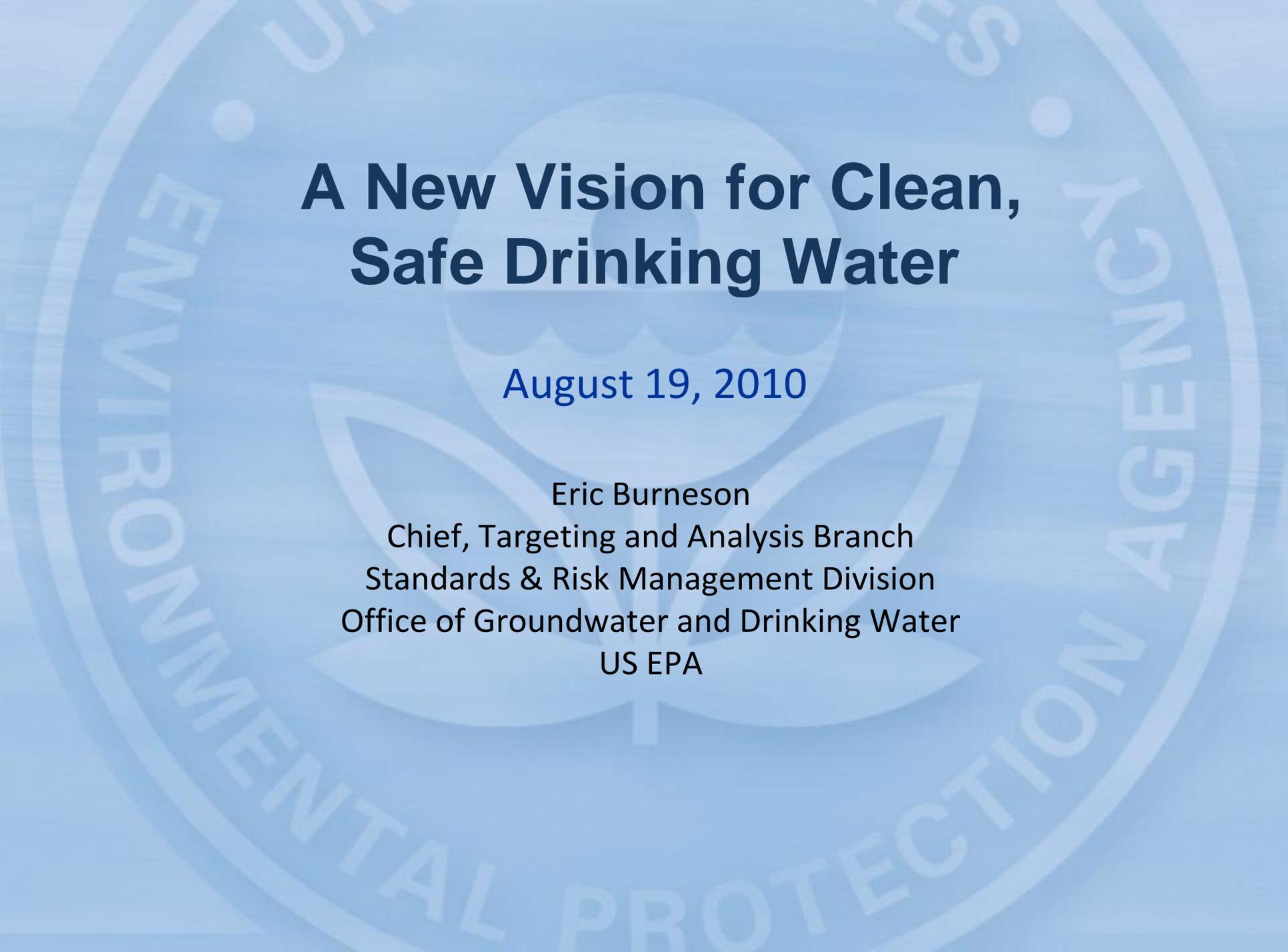
- Concern for small systems
- One commenter was concerned about the limited resources they have to address current regulatory situation, so concerned about potentially new regulatory actions
- Grouping contaminants based on the systems source water. Targeting monitoring and reporting requirements for utilities based on source water (i.e. industrial plants, agriculture, and waste water treatment plants).
- Implementation of a statutory linkage between Clean Water Act and the Safe Drinking Water Act.

Question 5: Example Contaminant Groups

- Arsenic
- Nitrogen-containing Disinfection Byproducts (DBPs): Both by-product formations and industrial effluent sources, such as: nitrosamines and N-morphs.
- One commenter suggested considering the "Risk Bubble" that was evaluated in the 1990s during the planning of the Stage 1 DBPs.

CONCLUDING REMARKS

Mr. Burneson thanked everyone for participating in the EPA Drinking Water Strategy listening session in Rancho Cucamonga and to AWWA CA/NV Section for hosting the session. He reminded the audience that EPA plans to hold a Stakeholder meeting in late September. EPA's goal is to keep people updated and provide opportunities to obtain additional input from the public and stakeholders. Mr. Burneson urged the audience to participate in the on-line Discussion Forum on the four principles of Administrator Jackson's Drinking Water Strategy.



A New Vision for Clean, Safe Drinking Water

August 19, 2010

Eric Burneson
Chief, Targeting and Analysis Branch
Standards & Risk Management Division
Office of Groundwater and Drinking Water
US EPA



Drinking Water Strategy

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



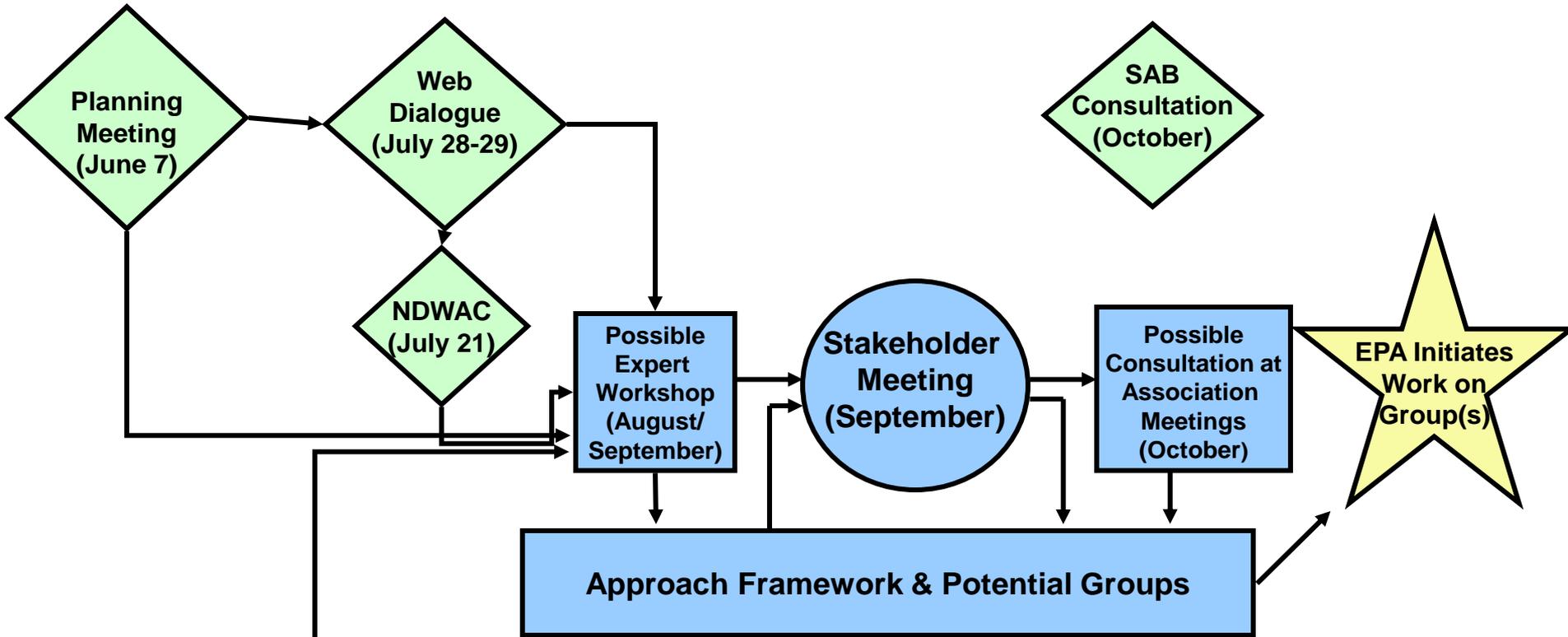
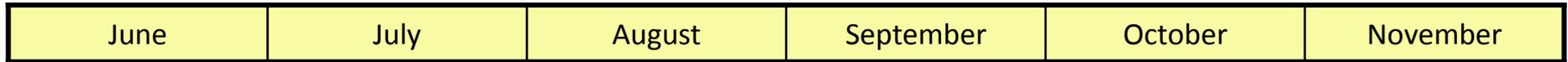
Goals for the New Vision

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.



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



Why Address Contaminants as Groups for Drinking Water?

- Evaluating and addressing contaminants as groups during the regulatory process may:
 - Be less time consuming and resource intensive
 - Account for risks from multiple contaminants
 - Deal more effectively with an increasing # of emerging contaminants
 - Provide water systems with an opportunity to make best long-term decisions on capital investments



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?



Next Steps for the “Groups” Principle

- Identify “key topic areas” for expert consultations
- Planning for the September 2010 stakeholder meeting (likely in DC)
- Develop approach and begin work on potential group by Fall 2010



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.



Develop New Technologies

- What technological approaches and contaminants will confront utilities in the future? What technologies should we consider for small systems to meet those challenges?
- What do utilities want to see in technologies that could address broad arrays of multiple contaminants in large and small systems?
- What are the drivers utilities consider when evaluating whether or not to install advanced treatment technologies?
- What is needed to convince the public and the private sector to invest in advanced drinking water technologies?
- Are utilities interested in removing unregulated contaminants? What would have to be proven for the individual or mixtures of contaminants?