Comments on Docket ID No. EPA-HQ-ORD-2009-0114
Information Collection Request (ICR): Questionnaire For Drinking Water Utilities Participating In Emerging Contaminant Sampling Program
By
The Metropolitan Area Utility Source Water Protection Committee of
The Potomac River Basin Drinking Water Source Protection Partnership
http://www.PotomacDWSPP.org
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The Potomac River Basin Drinking Water Source Protection Partnership is a consortium of regional water utilities and government agencies representing over 5 million customers in the Washington, DC metropolitan area and upstream Potomac River Basin communities. The Partnership provides a coordinated approach to protecting drinking water sources within the basin from contaminants, including drugs, chemicals and pathogens. The Partnership's Metropolitan Area Utility Source Water Protection Committee focuses on the water supply for the Washington, D.C. metropolitan area. These comments were developed by, and represent the views of, the Potomac Partnership's Metropolitan Area Utility Source Water Protection Committee (Metro Utility Committee).

The Potomac Partnership's Metro Utility Committee believes that the survey questionnaire is inadequate for interpreting the results of the sampling program for a number of reasons. Part B of the questionnaire asks for information on wastewater and industrial discharges within 25 miles upstream of an intake which seems to be an arbitrary distance. A better approach would be to define the area of interest for this information (watershed, time-of-travel, source water assessment area, etc.) or explain why a certain distance is significant.

The ICR announcement and questionnaire seem to emphasize wastewater treatment plants as the primary source of emerging contaminants although there are others sources of these compounds such as agribusinesses. While there is a general question in Part B of the questionnaire about whether source water is impacted by agrichemicals, EPA should also consult GIS coverages of land use/cover (crops, golf courses, utility right-of-ways, etc.) and animal feeding operations to help assess these impacts. Part B also asks for data on previous emerging contaminant analyses. This should be clarified to ask about unpublished or internal data so that utilities do not have to spend time reporting data that is available in published studies or databases from government agencies.

Furthermore, the study design implied by the ICR (a one-time sampling event of source and treated water at each of 50 drinking water treatment plants - DWTPs) is not adequate to meet the intended goal of using the results to advise the USEPA in determination of chemicals to consider for future regulation. We do not believe that 50 samples from volunteer water utilities (not selected through any sort of stratified random sampling) will adequately characterize emerging contaminant occurrence in any sort of meaningful way. This approach assumes that DWTPs deal with steady-state conditions and it also ignores

seasonal and analytical variability. More frequent sampling for a year (monthly?) at fewer sites is suggested as an alternative.

The Metro Utility Committee also has problems with the study's proposed use of paired (raw and finished water) sampling and a detailed questionnaire/survey at each utility for USEPA "to help interpret the data collected during the water sampling program." The questionnaire appears to be aimed at collecting information that could be used to draw conclusions about treatability, as opposed to occurrence. Such conclusions, we believe, would be inappropriate, given the limited number of samples to be collected.

Consider the example of a contaminant that is detected in the source, but not finished water, in a single paired sampling event. This result could be due to the treatment process removing or transforming the contaminant. It could also be due to fluctuating source water contaminant concentrations and imperfect sampling timing. Or it could be due to irreproducible analytical variability near the analytical method's detection limit (which is common when sampling for trace contaminants). Likewise, a contaminant that occurs in the finished water but not the source water could have been a trace byproduct created during treatment or contributed by treatment chemicals, or again, an artifact of sample timing and source water contaminant level fluctuations. It could also be due to the cleaner finished-water matrix allowing for improved detection.

The proposed plan appears to ignore extensive data that has been collected over the past few years on the occurrence of emerging contaminants by various organizations including some federal agencies. Some, if not most, of those data collection efforts include more than single event sampling and could provide more useful data. Some of this information is already available from EPA's own databases, USGS publications and possibly, source water assessment reports.

The Supporting Statement for the questionnaire includes a provision for confidentiality of the utility. However, this is not explicitly included in the Federal Register Notice. This should be included in the final notice to allay concerns over public relations issues based on the result of a single sample.

The questionnaire should not just be submitted electronically, but should be provided as an editable document (a pdf where you can type in responses) to make it easier to complete and return.

Based on the above comments, the Potomac Partnership's Metro Utility Committee believes that the proposed data collection could mislead EPA's effort for identifying/ prioritizing chemicals to be evaluated further. Thus, we believe that sharing our observations with EPA is constructive and could help them refine their questionnaire and sampling plan. The Metro Utility Committee appreciates the opportunity to offer comments on this proposal.