DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY
5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032
OFFICE OF THE GENERAL MANAGER
TEL: 202-787-2609
FAX: 202-787-2333

August 20, 2004

Jon M. Capacasa
Director
Water Protection Division
EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-20

Dear Mr. Capacasa:

This correspondence is in reply to your letter to this office and the Washington Aqueduct (WAD) dated August 3, 2004 referencing your office's approval to extend the corrosion control program that was piloted in WASA's 4th High Pressure Zone to the entire WAD service area. In general these comments are limited to the following two issues:

1. The listing of the water systems served by the Washington Aqueduct on page 3 does not appear to be a complete listing and should be corrected for the record.

2. USEPA's listing of the sampling requirements using citations to the Lead and Copper Rule (LCR) 40 C.F.R. §141.87 are excessive and are not supported by the cites used. While it might be argued that §141.82(f)(5), which was not cited, gives USEPA the authority to designate additional water quality parameters, it should be noted that this section also requires USEPA to explain the basis for said additions which it has not done.

With respect to Item 2, although far from clear, it appears that USEPA is using the same rational for supplemental sampling that was developed in response to bacteria issues from several years ago and is applying it in an attempt to assess the effect of the use of Orthophosphate to optimize corrosion control on a distribution system.

It is WASA's position that the original purpose of the Supplemental Sampling Program finalized in 2001 was to identify "dead ends in the system" to determine where water was not receiving adequate disinfection due to long residence times in the system and to indicate whether looping or other system modifications such as flushing were required to protect the consumer.

In this case where we are evaluating the long-term effect of OCCT with respect to reducing lead at the tap, the most effective approach is to continue the aggressive lead monitoring that WASA is committed to continue. WASA understands and is committed to the sampling requirements of § 141.87 for pH and Orthophosphate along with the required 25 sampling locations and the 2 samples per six- month sampling period.

WASA also understands that there are some concerns of the impact of the selected OCCT on such issues as the development of bio-films in the distribution system and that a need to monitor for some indicator parameters is valid. However, it is felt that the list that was included in your letter is excessive, redundant and that implementing such a program would, at best, provide data that would have limited value and, at worst, result in even further confusion of the issue.

In order to meet the requirements of your approval letter WASA proposes a monitoring program that meets the requirements outlined in 40 C.F.R.§141.87 as follows:

1. Take monitoring samples at 25 locations. The sampling points will be those delineated in the above noted Supplemental Monitoring Program Final Report dated August 31, 2001 which is presently being verified against WASA's updated hydraulic model. Any proposed revisions will be reported to your office for approval prior to the start of actual monitoring.
2. A sampling frequency of 2 per six-month period.
3. Checking pH at the sampling site with a portable meter.
4. Laboratory analysis for Orthophosphate.

However, WASA is willing to negotiate a more rigorous program that is based on sound engineering and scientific principles that will provide meaningful data that can be used to develop a statistically valid profile of any system changes that may develop as the OCCT moves forward. It is recommended that the following issues be considered in developing this program:

- That the LCR monitoring program be kept separate from the TCR program, WASA would object to any commingling of data from the two programs and any inference that any data collected in the LCR program would reflect non-compliance under the TCR.
- Realization that WASA has little control over any of the parameters monitored and, to this extent, the data collected must not be considered as regulatory in nature but rather as data that is collected to be reviewed by the TEWG from the perspective of any need to modify the OCCT.
- Consideration that tap samples, as required under §141.87, may not be the best locations to conduct a monitoring program designed to assess distribution system conditions. Consideration should be given to a combination of tap samples and hydrant samples located on distribution lines may provide more meaningful data.

In closing, it should be noted that it is WASA's commitment to do what is necessary to protect the health of its customers and has clearly demonstrated this by its extensive monitoring efforts that far exceed any other efforts undertaken in this Country. However, as this program moves out of the reaction stage, it is imperative that monitoring efforts become more focused and value oriented than the initial efforts.

To this end it is recommended that all parties involved, (EPA, WAD, WASA) sit down together as soon as possible to reach agreement on the following issues:

1. Sampling frequency
2. Sampling locations
3. Parameters to be tested
4. Who will do the sampling
5. Who will do the testing
6. Testing procedures, bench or field
7. Reporting format
8. Distribution of Data

Per recent discussions between Mr. Richard Rogers of your staff and John T. Dunn of WASA, it appears that a meeting can be scheduled as early as next Tuesday before your second public meeting on expanding the Orthophosphate program system wide. It is felt that consensus can be reached at that time such that the sampling program initiated in a timely manner.

Sincerely,

Jerry N. Johnson
General Manager

Cc: Thomas P. Jacobus