UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. John T. Dunn, P.E.
Chief Engineer/Deputy General Manager
District of Columbia Water and Sewer Authority
5000 Overlook Ave., SW
Washington, DC 20032

SEP 2 9 2005

Dear Mr. Dunn:

Thank you for submitting the District of Columbia Water and Sewer Authority's (DCWASA) September 15, 2005 update on the progress of unidirectional flushing of the District of Columbia distribution system. We are pleased to see that this effort is nearing completion. In light of DCWASA's revised projection that it will complete the unidirectional flushing program by November 18, 2005, please submit DCWASA's next flushing progress report no later than December 10, 2005. We believe this should give DCWASA adequate time to complete the flushing program and compile the report.

DCWASA has also requested additional time to January 10, 2006 to submit its draft 2006 flushing plan. As described in our August 4, 2005 letter, EPA plans to include DCWASA's flushing plan as part of the final optimal corrosion control treatment (OCCT) designation. For this reason, and because the flushing program for 2006 is taking a different approach than in previous years, we would like sufficient opportunity to review and comment on the plan. We do not feel that a January 10, 2006 deadline for submission of a draft plan allows such an opportunity, as the plan is to be finalized by January 31, 2006.

We understand the need to compile and thoroughly review the water quality data from the 2004-2005 flushing program prior to developing a plan for 2006. Instead of submitting a detailed draft of the 2006 flushing plan by January 10, 2006, we propose that DCWASA submit by December 15, 2005 a draft of the strategy for using water quality parameters to target areas for flushing. The draft need not provide quantitative trigger or range values for the various water quality parameters, but it should outline the approach to identifying and prioritizing zones for flushing, using historical knowledge and findings of the water quality data analysis performed to date, and include a preliminary list of water quality parameters that will be considered.

If you have any questions, please feel free to contact me or call Rick Rogers, Drinking Water Branch Chief, at (215) 814-5711.

Sincerely,

Jon M. Capacasa, Director
Water Protection Division

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