EPA Commitments to Stakeholder Involvement

Proposed Revised Total Coliform Rule (RTCR)
Stakeholder Meeting
April 3, 2009
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Objectives

- Review the Recommendations for Stakeholder Involvement from the Total Coliform Rule/Distribution System Advisory Committee (TCRDSAC) Agreement in Principle (AIP)
- Introduce the topics for today's discussion
- Outline the rule schedule

AIP Recommendations for Stakeholder Involvement

- 16 recommendations for stakeholder involvement
- EPA agreed to provide those opportunities
- Some are concurrent with the development of the proposed rule
- Others are more long term
- Some relate to the Research and Information Partnership recommended in the AIP
- Today’s meeting is in response to one recommendation for an annual meeting to inform EPA's effort to propose a rule that has the same substance and effect as the elements of the AIP

Elements for today's discussion

Element	Recommendation
Issues in developing the rule, including linkages to other rules	Meeting at least once a year … dialogue
Public Notification and Consumer Confidence Report Language	Opportunities for public comment should include a stakeholder meeting

Elements for today's discussion (2)

Element	Recommendation
Guidance manual development plan and schedule	Discuss the development plan with interested stakeholders
Evaluation of currently approved coliform analytical methods	To determine whether these methods continue to be appropriate

Elements for today's discussion (3)

Element	Recommendation
Review of the Alternative Test Procedure (ATP) microbial protocol for TC/EC methods for drinking water	To determine if the criteria for acceptance of the new methods are consistent with the intent and objectives of the TCR, considering … sensitivity, specificity, matrix interference, false (+) and false (-) results, temperature, and holding time
Upgrade to SDWIS	Engage stakeholders as part of the information requirements planning process.

AIP Recommendations – Research and Information Collection Partnership

1. Steering Committee – meet at least once per year
2. Regular review and evaluation of research - to refine the agenda
3. Progress review and data evaluation – stakeholder meeting at least every two years
4. Information collection process – consult with stakeholders in advance
5. Findings and results – consult with a representative group of stakeholders concerning actions being considered

Other AIP Recommendations

… recommends that EPA and primacy agencies reference and compile existing requirements, guidance, and other information on **cross connection control** practices from EPA, states, AWWA, and other relevant parties with the aim of having a single, complete **resource library** available to the public.

The TCRDSAC recommends that EPA **develop goals and performance measures** …in parallel with rule development … aimed at evaluating the rule's long-term effectiveness. ... recommends that EPA conduct a review of the effectiveness of the RTCR using a stakeholder process … in accordance with the Agency's existing 6 year review process.

Other AIP Recommendations

The TCRDSAC encourages the development of **national and regional distribution system optimization partnerships** that focus on protecting the integrity of drinking water quality once it is delivered to the distribution system
The TCRDSAC recommends that EPA, in cooperation with primacy agencies, **develop minimum qualifications and a standardized training program for sanitary surveyors**, and evaluate the need for certification.

Schedule for the RTCR

Develop rule, preamble, and support documents	through June	2009
SAB review	May/June	
NDWAC consultation	May	
2nd Stakeholder meeting	April	2010
Proposed rule	August	
Final rule	August	2012