

Drips & Drops



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Distribution System Potential Rule

Comment:

The nine white papers have been combined to five which are posted on USEPA's web page at - <http://www.epa.gov/ogwdw/tcr/tcr.html#distribution>. Additional public stakeholder meetings will be held. It is expected that the six-year review process will incorporate any regulatory initiative USEPA pursues.

The nine white papers address the following topics:

- ◆ cross-connection control;
- ◆ deteriorating infrastructure;
- ◆ repair/replacement of water main;
- ◆ intrusion; nitrification;
- ◆ decay of water quality over time;
- ◆ covered storage;
- ◆ bio-films;
- ◆ permeation;
- ◆ permeation/leaching

Background

The U.S. Environmental Protection Agency (USEPA) is completing a background investigation to determine if they need to promulgate a distribution system rule. The reader can be assured that USEPA will promulgate such a rule and it will be difficult for small water systems to comply with the requirements.

Problem

Health risks associated with the distribution system come from multiple sources. One of the major concerns is cross-connections in the distribution system. Numerous cases can be cited where contaminants enter the distribution system through backflow and back siphonage. Both chemical and microbiological contaminants can enter the distribution system and cause acute health effects to unsuspecting consumers. Of further concern is intrusion of contaminants through pipeline repair, replacement and installation. Exposure to contamination can be caused by deterioration of the pipe materials, leaching of contaminants from pipe materials, and re-growth of microbes within the distribution system.

Quantification of the national occurrence of the risks associated with distribution system remains a problem.

Regulatory Background

At the conclusion of negotiations for the Stage 2 Disinfection Byproducts Rule, the FACA group without the NRWA recommended the following:

- ◆ Evaluate available data and research on aspects of distribution systems that may create risks to public health
- ◆ Initiate a process with stakeholders for addressing cross-connection control and backflow prevention requirements
- ◆ Consider additional distribution system requirements related to significant public health

Regulatory Activities

An expert workshop was held in June 2000 where 20 people representing environmental, state, utility, and academia interests attended. The expert panel agreed to prepare white papers to summarize available information on the nature, type and extent of the potential public health risks. A follow-up workshop was held in March 2002 and the panel reviewed nine draft white papers and provided feedback on the technical issues addressed. Subsequently, the nine white papers were posted on USEPA's web page. Another stakeholders workshop was held in Seattle November 2002 and NRWA was represented.