Stakeholder Meeting Summary

EXECUTIVE SUMMARY

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Small Systems Treatment Technologies

July 22-23, 1997

Background

The Environmental Protection Agency held a stakeholder meeting on treatment technologies for small systems, on July 22 and 23, in Washington, DC. The goal of the meeting was to obtain feedback on approach to implementing these technologies, as required by the Safe Drinking Water Act (SDWA), as amended in 1996. Representatives from states, water systems, and equipment manufacturing companies were among key stakeholders present.

The objective of the meeting was to receive input on the following issues: 1) EPA's proposed small system compliance technology list for the Surface Water Treatment Rule (SWTR), due in August 1997; 2) development of the compliance technologies list for the other regulated contaminants (due in August 1998); and 3) development of national-level affordability criteria, which will be used to determine whether a given system will proceed along a compliance or variance pathway and which technologies would be available for the system. The national-level affordability criteria do not apply to the list of compliance technologies for the SWTR.

Summary

Day One -- Compliance Technologies

The first day of the meeting, stakeholders discussed the initial list of compliance technologies for the SWTR. This list was presented in the stakeholder draft of the "Small System Compliance Technology List for the Surface Water Treatment Rule" (EPA 815-D-97-002). In this draft, six disinfection technologies and ten filtration technologies were evaluated as potential compliance technologies. Some of these technologies are listed in the SWTR; several are new. The disinfection technologies evaluated were chlorine, chloramines, chlorine dioxide, ozone, mixed-oxidant disinfection and ultraviolet disinfection. The filtration technologies evaluated were conventional filtration, direct filtration, diatomaceous earth filtration, slow sand filtration, reverse osmosis filtration, nanofiltration, ultrafiltration, microfiltration, bag filtration, and cartridge filtration.

Stakeholders reviewed the list of compliance technologies for the three small system size categories. In the draft list, EPA excluded certain technologies because of concerns about the ability of small systems to operate them or concerns about consistent performance. Many stakeholders said they preferred EPA to list these technologies and concerns rather than exclude these technologies. They explained that they want the compliance technology list to provide more technology options for those systems capable of operating more complex technologies. They felt that the consistency concerns could be addressed through the site-specific pilot testing that can be required by states. EPA agreed with these comments, and the final guidance document reflects this change in approach (EPA 815-R-97-002). All of the previously mentioned technologies were listed for all three size categories along with limitations that should be considered prior to treatment selection.

Day Two -- Affordability

The second day focused on national-level affordability. The primary role of national-level affordability is to determine whether a system should proceed down the compliance or variance technology pathway. This depends on the size of the system and the quality of the source water. For a given systems size category, the national-level affordability screen would identify those systems with source water quality so poor that they may be eligible to receive a small system variance. Several other criteria must also be met before a system can receive a small system variance, including an evaluation of treatment, alternate source and regionalization options.

EPA sought input in identifying the best measure of national-level affordability and the components that should be included in the national-level affordability criteria. This discussion provided many of the stakeholders with a clearer understanding of the role of national-level affordability and how it differs from system-level affordability. Some said it would not be appropriate to use the increase in annual household water bills as a measure of affordability for non-transient, non-community water systems. Others said supplemental funding (ie: Drinking Water State Revolving Fund) should not be incorporated into the national-level affordability criteria because they may not be available for all systems. In some states, private systems are not able to receive public funds.

Many stakeholders wanted more documentation on the use of national-level affordability criteria and options that are being considered by EPA for these criteria. These stakeholders also wanted more information on the relationship between the national-level affordability criteria and the other criteria that must be evaluated prior to granting a small system variance. In particular, many stakeholders suggested further discussion on the criteria used to determine that the variance technology is protective of public health. Since variance technologies may not achieve compliance with the maximum contaminant level or treatment technique, stakeholders wanted to understand the criteria that would be used to make this determination.

Next Steps

Criteria for both national-level affordability and public health protection will be discussed at an upcoming stakeholder meeting, likely to be held in early 1998. The meeting will also cover an initial analysis of the available technologies for the other existing regulations (first cut at the 1998 list). For more information on treatment technologies, contact Jeffrey Kempic at Kempic.Jeffrey@epamail.epa.gov.