

**MEMORANDUM**

TO: Tom Curtis, American Water Works Association
Mike Keegan, National Rural Water Association
Jim Taft, Association of State Drinking Water Administrators

FROM: Jack L. Daniel, Administrator *JLD*
Environmental Health Services Section
Department of Health and Human Services
Regulation and Licensure

DATE: September 9, 2005

SUBJECT: Total Coliform Rule

It is my understanding that EPA plans to revisit the Total Coliform Rule for the purpose of inserting a distribution component (backflow) as a result of Stage 2 FACA agreement in principle.

It is also my understanding that EPA is willing to discuss a change to the maximum contaminant level component of the rule.

In the recent past, I have discussed with all three of you the need to make the finding of E. Coli a violation of the rule and not the finding of total coliform a violation of the rule.

The use of total coliform for rule violation purposes is causing this nation a lot of money needlessly and is misleading to the American public. Collaboratively, this is an opportunity to put credibility into the Total Coliform Rule and improve the confidence of this nation's public water consumers.

Enclosed please find an article entitled, "The Public Health Significance of Bacterial Indicators in Drinking Water" as background information supporting this request for action and unity on this matter.

If you have any questions concerning this issue, please feel free to contact me at 402/471-0510.

JLD/jem

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES REGULATION AND LICENSURE

PO Box 95007, LINCOLN, NE 68509-5007 PHONE (402) 471-2133

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