December 11, 2012

Dear Sir,

In regard to the EPA’s Third Unregulated Contaminant Monitoring Rule, please consider the following:

The Lincoln Water Commission in Lincoln, Rhode Island, serves some 20,000 customers. It purchases all water from the City of Providence Water Supply Board, along with most of the population of the State of Rhode Island.

As in many water systems throughout the country, money is tight and the need for infrastructure work far exceeds the funds available.

The new requirement in the UCMR3 rule that consecutive systems also monitor for the 21 chemical contaminants is an extra expense that will provide minimally useful data. Consecutive systems such as ours purchase ‘finished’ water from a regional water treatment plant through a closed system and deliver it directly to customers. Nothing is added, and due to water pressure in the pipes, nothing leaks in. The monitoring results from the regional treatment facility should be sufficient to determine the presence of these chemicals.

The additional expense, time, and effort involved in meeting the requirements of a Federal program with questionable benefits is a burden that smaller systems do not need to shoulder.

The State of Rhode Island recently passed legislation, the Water Use and Efficiency Act (46-15.8) which includes the statement:

“State agencies need to become advocates for positive solutions by removing overlapping and burdensome planning and regulatory requirements.”

Perhaps a word to the wise.

John S. Faile, PE
Superintendent
Lincoln Water Commission
Lincoln, Rhode Island
Daniel,

As we discussed this morning, the UCMR 3 rule is creating a tremendous hardship on water systems. In the rule ground water systems that wish to monitor from a representative entry point to the distribution system (EPTDS) must submit either state approved, UCMR 2 approved or propose a new representative sampling plan. In the rule, this information was to be submitted by August 1, 2012, but the certified letter that the systems received did not state the August 1, 2012 deadline. The letter did state that PWS's did have until November 29, 2012 to review, update sample locations and revise monitoring schedules. This has a tremendous impact on water systems due to the cost of the sampling. It is my understanding, if a system had a single source determination you could reduce the number of samples from the total number of wells (EPTDS) to one representative sample. The UCMR 3 rule also requires MRT samples to be taken per EPTDS, which sample sites could also be reduced with the single source determination.

It is my understanding, water systems with a population less than 10,000, EPA is incurring the cost of sampling and water systems with a population greater that 10,000, water systems are responsible for the cost. I understand that only one water system met the August 1, 2012 deadline in EPA's Region 4, in my opinion this should be reviewed for consideration. Also it makes me wonder if the millions of dollars being spent on UCMR 3 could be reduced if consideration was given for systems with population less than 10,000 where EPA is incurring the cost or was consideration automatically given to these systems.

With the economical times water systems should not have to incur these types of additional cost. Thank you for your assistance in this matter, please do not hesitate contacting me if you should need additional information.

Barry T. Sutton
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to Mike

Mike,

We are a consecutive system of Morristown. We did not test for the first two UMCR rules and don't quite understand why we are included in round three. Our system population is over 10,000. We have registered on the (CDX) Central Data Exchange web site and it is showing that we have two test sites. I have received a quote from Northern Lake Service, Inc. for $4,480.00. That seems to be a pretty good price from what I'm seeing from other people. We are here to do whatever is necessary of us to comply with all health rules and regulations. It is a huge cost for a lot of the systems. My understanding is that the EPA will bear the cost of the systems under 10,000. I would like to see them pay all the cost associated with testing for everyone. I'm sure that is not going to happen! I would be glad to share the information I have on the lab with anyone wanting it. Please just let me know if I can be of any other assistance.

I hope this has helped in some way and look forward to hearing from you soon. We hope everyone has had a Blessed Thanksgiving and we wish everyone a very Merry Christmas!!