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December 15, 2004

Jon M. Capacasa, P.E.
Environmental Protection Agency
Region III
3WP00
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Capacasa:

The following is in response to your letter of November 16, 2004 regarding DCWASA's unidirectional flushing program as outlined in USEPA's approval of the optimum corrosion control interim program. The goal was to complete this flushing, to the extent feasible, before the onset of freezing weather which effectively precludes flushing for safety reasons. To this end DC WASA updated and significantly improved the existing protocol for the unidirectional flushing program that was developed for the previous system-wide flushing program in conjunction with USEPA.

To facilitate the flushing program DCWASA elected to have the program implemented through a Corps of Engineers (COE) contractor in spite of problems created with our unions. The actual flushing contract was issued through the Washington Aqueduct (WAD). Once the contract was issued the contractor, in essence, changed the ground rules that resulted in a cost escalation of the estimated price from $1.7 million to $2.4 million.

As DCWASA felt the proposed changes modifications were unreasonable the normal reaction would have been to cancel the contract and develop an alternate approach. However, the time to make such a change would have effectively precluded implementing the proposed program during 2004. DCWASA's commitment to the flushing program dictated that we work out a compromise with the contractor in order to implement a program that was already behind schedule due to the late completion of the orthophosphate feed system.

Unfortunately, the time estimated by the consultants to perform an adequate flush was twice what was required once the field work actually started. In addition, production was slowed by the compromise that moved part of the program to day light hours as well as our unions refusal to work alongside the contractors. In summary the flushing program during 2004 was far less productive than anticipated. Basically, the contractor completed the flushing of only 30% of the system, which, when coupled with the flushing done by DCWASA personnel resulted in 40% of the entire system being flushed after the start of Orthophosphate feed.

The flushing has been shut down for the cold weather season and a final report is expected from the contractor within two weeks. In addition DCWASA is presently evaluating data from field sampling which, to date, has not indicated a consistent discernable distinction in water quality between flushed zones and those zones that had not been flushed. In addition, it is DCWASA's opinion that the OCCT test data generated to date indicates the system is stable and no immediate action is indicated.

Based on the above, DCWASA requests that the development of a specific comprehensive flushing program be deferred until after the salient issues are considered under the following approach:

1. DCWASA will complete flushing the remaining portions of the system as soon as practical in 2005 continuing the protocol used during 2004.

2. During the next three months DCWASA flushing crews will inspect and clean all needed valve pits and make any valve repairs needed to insure that the once the unidirectional flushing program is resumed, maximum production will be achieved.

3. DCWASA will develop and submit to USEPA not later than January 31, 2005, an outline of a proposed revised ongoing flushing program. In developing this program the following items will be considered:

    - The force level required to complete the suspended system wide flushing program expeditiously and how these force needs can be transitioned to an improved ongoing flushing program
    - The frequency of flushing to include the possibility of a tiered program with more frequent flushing in selected areas
    - The data recorded during the actual flushing operations to date
    - The results of ongoing system testing with respect to flushing requirements
    - The use of automatic flushing valves in selected areas
    - QA/QC requirements

4. The modified flushing protocol will be implemented in 2005 as soon as the remaining portion of the system is flushed under the existing protocol.

5. The existing capital improvement program to eliminate system dead ends will be accelerated to insure completion as soon as practical in 2005.

It is felt that the design and implementation of an effective and achievable ongoing flushing program based on actual field data and experiences requires full consideration of all relevant issues and DCWASA is committed to achieving this goal. I would appreciate your comments on the proposed approach as soon as possible. I will be in the office through the end of the year with the exception of the actual holidays.

Sincerely,

John T. Dunn, PE
Chief Engineer/
Deputy General Manager

CC:
Jerry Johnson
Avis Russell