

US EPA ARCHIVE DOCUMENT



DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

OFFICE OF THE GENERAL MANAGER

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September 24, 2004

Ms. Karen Johnson, Chief
Safe Drinking Water Act Branch
United States Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: MCL Violation, Total Coliform Rule

Dear Ms. Johnson:

This is to give your office formal notice that the District of Columbia Water and Sewer Authority (WASA) has exceeded the 5% monthly average MCL outlined in the Total Coliform Rule for the month of September 2004. Sampling will continue through the end of the month on our normal schedule with the results being reported under the usual protocol. However, WASA will mathematically not be able to reach compliance through additional sampling given the number of positive results obtained from the laboratory as of yesterday. Of the 179 tests complete at this time WASA has already had 19 positives but there have been no positives with respect to E coli. Also note that, to date, none of the required retests has been positive.

Mr. Richard Rogers, USEPA, participated in a news briefing on this issue yesterday and in further discussions this morning with the Technical Expert Working Group this morning and he is convinced that the high results are due to the introduction of Orthophosphate into the distribution system which was designed to enhance corrosion control and subsequently loosened existing bio-film masses into the system. Dr. Gregory Pane, Director of the DC Health Department and representatives of the Washington Aqueduct and the Center for Disease Control also attended the meeting and briefing.

Mr. Rogers has also determined that there is no public health risk associated with this issue which has also been confirmed by Dr. Gregory Pane. Further, Mr. Rogers feels that WASA is taking all the recommended actions to minimize the effects of this phenomenon. These actions include increased unidirectional flushing, maintenance of normal total chlorine residuals and increase QA/QC of the sampling program. WASA intends to issue the required public notices as soon as practical which will be well ahead of the 30-day requirement contained in the TCR.

WASA will continue to keep your office informed of any significant changes in the status of this issue and had publicly committed to do the same with its customers. Please feel free to call me any time with respect to this or other issues. My office phone is [REDACTED] and my cell number is [REDACTED]

Sincerely



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

Cc: Thomas Jacobus