

SUMMARY OF COMMENTS
A NEW VISION FOR CLEAN, SAFE DRINKING WATER
LISTENING SESSION
American Water Works Association's Annual Conference and Exposition
McCormick Place Convention Center, Chicago, IL
June 22, 2010

BACKGROUND

At a special event during the American Water Works Association's 2010 Annual Conference and Exposition in Chicago, EPA participated in a listening session on the Agency's new Drinking Water Strategy. As announced by U.S. EPA Administrator Lisa P. Jackson in March 2010, the Agency is renewing its efforts to more quickly and cost-effectively identify and treat new contaminants in drinking water amidst over-worked systems and strained budgets, and to improve information exchange between EPA and state/local partners.

The purpose of this listening session was to hear from the public and stakeholders their thoughts on how the Agency should proceed and implement the Drinking Water Strategy. This summary provides the questions that were presented to the audience and their responses.

INTRODUCTION

Steve Via, Regulatory Affairs Manager at American Water Works Association (AWWA), moderated the listening session and introduced Cynthia Dougherty, Director of EPA's Office of Ground Water and Drinking Water. Mr. Via stressed that the goal for the listening session was for EPA to obtain feedback and input from the participants, hear their ideas, and take those ideas forward as the Agency implements the Drinking Water Strategy.

Ms. Dougherty thanked AWWA for providing this opportunity and the attendees for being willing to share their ideas and thoughts on the Administrator's approach for clean, safe water. Ms. Dougherty reviewed the agenda for the listening session. She mentioned in addition to listening, EPA would provide a detailed summary and would be considering their ideas as we develop a framework for the Drinking Water Strategy. Her presentation, titled "A New Vision for Clean, Safe Drinking Water," provided a summary of the strategy and questions for the participants to consider. In addition, it included key points for the following principles of the strategy:

- Address contaminants as groups rather than one at a time.

- We are not just going to pick groups of contaminants; we want to pick groups that would provide meaningful opportunity for risk reduction.
- Foster development of new drinking water treatment technologies.
 - Treatment technology helps to inform drinking water standards instead of the other way around, especially for small systems.
- Use the authority of multiple statutes to help protect drinking water.
 - We want to ensure that decisions that are made under other statutory authorities (e.g., Federal Insecticide, Fungicide, Rodenticide Act (FIFRA), and Toxic Substance Control Act (TSCA)) are protective of public water.
- Partner with states to identify ways to share all public water systems monitoring data.
 - EPA is working with the Association of State Drinking Water Administrators (ASDWA) to figure out how to share monitoring data, to fix standards, and to take the data back to other programs to deal with source water programs, and to be able to characterize drinking water quality across the country.

Ms. Dougherty emphasized that the Agency does not want to implement the Drinking Water Strategy behind closed doors. Ms. Dougherty provided a timeline for outreach on the Drinking Water Strategy to show how EPA plans to encourage public and stakeholder involvement in this process. This listening session was the first of several opportunities to share ideas so EPA can hear how the public and stakeholders think we can approach the issues. The presentation is attached as an appendix to this document.

OPEN SESSION: ADDRESS CONTAMINANTS AS GROUPS

EPA Questions:

- What are some potential approaches for addressing contaminants as groups?
- What are some factors that EPA should consider in deciding what makes a good group?
- What are the key (2-3?) technical challenges?
- What are the key (2-3?) implementations challenges?
- Can you provide examples of contaminant groups (2-3?) that may present a meaningful opportunity to protect public health and reduce risk?

Participant Responses:

- Looking back at total trihalomethanes (TTHMs) in the 1970's, we really did not know much about health effects, but we worked through that and came up with good rules, like radionuclides as well (alpha & beta emitters, then strontium). Regulating groups that make sense. What is the next group that will make sense? I do not see a group of contaminants that would be a good candidate now.

- EPA can group by treatment, size, etc., but you still have to consider that one of the contaminants is going to be the most toxic and will have to have a maximum contaminant level (MCL). This will be the same situation as now (having to have risk data for an MCL). If we group contaminants by treatment capabilities, we can specify a treatment today, but tomorrow we may find something that we will need to treat for that was not covered by the initial treatment. What treatment residuals would we be creating?
- It makes sense to start with grouping by environmental or human toxicity – acute, chronic, non-toxic. For some contaminants, we have seen environmental effects, but not human effects. Endocrine disruptors have no determined human effects, just environmental. How best to group is confusing if you are going to consider public risk impacts? In drinking water, we are looking at human ingestion, so if we are thinking about human effects, we should look at toxicity to humans. One can come up with all types of potential groups (i.e., treatment, molecular weight or environmental endpoint) but we still need overall human health effects, which is not known yet.
- EPA should consult industrial hygienists (OSHA's occupational exposure methods) about chemical mixtures and human health impacts for workers. Analyses of worker exposure looks at exposure to multiple chemicals (e.g., chemicals that target similar organs and exhibit the same symptoms, health conditions)/multiple effects. EPA could review occupational chemicals that produce or create the same health effects.
- EPA should review President Obama's Panel on Cancer recent report. Group contaminants by everyday decisions people are making related to products and uses of water. We must consider the chemicals around us and the chemicals we use. Consider the sources of hazards- such as geology, transportation, nanoparticles, new materials, pollution from specific industries, consumer goods, agriculture – look at sources by industry. Look at the industries that these contaminants come from because Congress will need to evaluate whether EPA can legally regulate the industries.
- In terms of implementation challenges, if you regulate a group of five chemicals, do you measure individually and set one standard for all combined? If all chemicals act in the same way, one might want to set standard as a group. In California under prop 65 – we tried to evaluate and regulate contaminants as a group, but we found we did not have data for the contaminants as a group – only individually. How do you regulate as a group if you do not have information on individual contaminants? How do you regulate as a group when you do not have data as a group?
- Are the regulatory determinations questions applied to a group differently? What if there is a contaminant in the group without adverse health effects data? (Note: EPA clarified the SDWA criteria for promulgating regulations are a substantial likelihood that a contaminant(s) be found in public water systems at levels and frequency of concern, have an adverse health effect, and present meaningful opportunity for health risk reduction). Someone asked if those criteria applied to the group or the individual contaminants.
- How do you deal with the public, and address whether they are getting safe water, when regulating as a group. Take chloramination, people are still scratching their heads over that one. EPA needs to deal with this issue. The technology is the easy part. We can treat the water. The question is how do you relay the message to the public?

- One challenge is finding risk reduction information. Systems can take stuff out, but we do not have the data to say what the risk reduction is. Do we count potential benefits if we do not know complete risk? Does the meaningful opportunity change or can EPA decide when we should regulate as a group? Can we count the potential benefits of public health impact without meeting them? Is there a threshold for risk reduction – can remove something but do not know the health effects and can we take credit for that removal? (EPA noted that the decision to regulate is in the sole judgment of EPA's Administrator.)
- If we regulate based on groups, the contaminants might have different treatment technologies. With respect to groupings according to the treatment technologies. This could create confusion if the group has five treatment technologies. Group by treatment technology – 5 contaminants with 5 technologies will be hard and/or confusing.
- EPA should gather unregulated contaminant analytical method information; read the peaks – including tentatively identified compounds. This analysis is already being done by some systems. How do you mandate or report this information?

OPEN SESSION: DEVELOP NEW DRINKING WATER TECHNOLOGIES

EPA Questions:

- What technological approaches and contaminants will confront utilities in the future? What technologies should we consider for small systems to meet those challenges?
- What do utilities want to see in technologies that could address broad arrays of multiple contaminants in large and small systems?
- What are the drivers that utilities should consider when evaluating whether or not to install advanced treatment technologies?
- What is needed to convince the public and the private sector to invest in advanced drinking water technologies?
- Are utilities interested in removing unregulated contaminants? What would have to be proven for the individual or mixtures of contaminants?

Participant Responses:

- We are already addressing technologies today. Arsenic treatment and granular activated carbon (GAC) are removing multiple contaminants, so in a sense we are already doing this without getting credit. One of the problems is residuals management (whether the contaminants are regulated or not). One consideration is what can we do about the residuals we are creating with advanced treatment? There has to be a balance between the technology and the residuals.
- When monitoring and performing analytical work, we have an opportunity to gather information on more than just what we are regulating. We are able to detect a whole host of contaminants that are there and these data can be used to evaluate treatment. EPA should look into trying to encourage people to do this, and report it. Do not know how EPA would mandate it, but should encourage States to report it. (EPA noted that the

statutory limitations are on what we can require people to report [i.e., the Unregulated Contaminant Monitoring Rule]– EPA we can ask or encourage this action).

- As we move to more advanced treatments, there needs to be some consideration to dual systems (grey/clean water). Are you looking at ultra-pure water at all times?
- EPA should focus on improving current filtration technologies, so do not just look at new technologies; work on perfecting existing treatment technologies.
- My number 1 issue is small systems and that the technology must be affordable. Affordable for a DC suburb vs. affordable in North Dakota is very different. It is not a question of whether we should do it, but how we do it. We need to continue to work on small system affordability – defining affordability.
- There is also a carbon footprint consideration: will need to find a balance between energy use and new treatment technologies. Lots of technology is energy driven – need to consider greener technologies.
- There are many considerations for EPA; multiple regulations, residuals vs. treatment, carbon footprint could be health issue in the future – balance is what we need more than new technologies. How does everything connect? Simultaneous compliance, residuals, treatment, health risks, we have multiple areas – new technologies may not be the answer, deal with the existing. Many regulations are competing with one another (simultaneous compliance issues).
- As one moves any new technology into the mainstream there is a big learning curve for operators that use conventional treatment (e.g., getting used to membrane technologies). Systems are relying on vendors. As we get more and more technology-oriented, this reliance will increase. I am not talking about towns of 3,300 but up to 20,000. I am hesitant to push sophisticated technologies as a solution.
- State regulators need to understand these new technologies too in order to approve. Advancing new technologies is fine, but we need to make sure people understand them and implement them well.
- One question is the Sustainability versus New Technology: Almost as soon as anything involving computer or software related comes out, there is something new and they have to be replaced. With new technologies, we will need new analytical capabilities (hardware/software) to keep up. There is also the question of spending the higher cost for analytical equipment to meet low quantification levels and whether those levels are appropriate.
- I am uncertain of what the answer is. The audience seems to be not willing to comment for fear of the response we are going to get. We are at a point where we have a limited set of options, and we are poised to make the technological leap – what are the costs/benefits? We could approach this from a technology approach – see what the technology can achieve. Cost considerations are more acute now than in the 1980's.
- I would like to see what could be done about release of pharmaceuticals, and agricultural run-off. Given the source impairments and the very important and expensive treatment that we are set to go off on, we should look at source water issues. What can be

controlled from getting into the source water and what can be removed from the plant through treatment technologies? Look at source control before jumping into new technologies. Important to look at source control as well as minimizing risk from trace chemicals. More bang for buck to control sources.

- Some attention should be focused on operator knowledge/ability.
- America does not always invent everything, so we should look at what other countries have done, so we can learn from what they have gone through.
- We should look at what other countries are doing with technology and other groupings. Technology companies are aware of public health responsibility, and they take risks. Health is primary concern – risk sharing is necessary, it takes some flexibility to provide cost savings and long-term benefits. EPA should allow that flexibility and give public water systems (PWSs) some latitude for being the first-users of new technologies.
- An example of an impediment to remove is proprietary products limitations – I know of a person that has propriety product, and has a trademark, but because it is proprietary, it has to be proven overseas, and before they get approval here [in the US], it loses the trademark and China will wind up producing it.

OPEN SESSION USE OTHER AUTHORITIES

EPA Questions:

- EPA is focusing on regulated contaminants and those that are on the CCL3. Are there other pesticides or chemicals in commerce you believe EPA should focus on?
- EPA has the ability to limit or restrict the use of chemicals, if warranted. What kind of requirements or criteria should EPA consider for chemical contaminants using authorities other than SDWA?
- How often and who should be conducting monitoring to determine occurrence? Should it be states, PWS, or pesticide manufacturers?
- What other opportunities do you suggest for EPA to use authorities to protect drinking water?

Participant Responses:

- Source water protection and control is a great opportunity (Clean Water Act, (CWA)) to take out precursor material, e.g. nitrogen, dissolved organics. In Texas, they are encouraging disposal of pills in bags for landfill disposal, rather than flushing pills down toilet.
- Under current source water protection (SWP) framework – Use CWA for point source and SWP to keep contaminants out of watersheds.
- From SWP point of view – lot of coordination is already going on in addition to statutory fixes. AWWA has standard and guidebook. People are talking about SDWA/CWA

integration, but it is challenging. Integrate ground water protection as another component that should be considered.

- Hearing a lot about these things from the SDWA side - I am curious to know if there are reciprocal thoughts from units within EPA on the CWA and Federal Insecticide Fungicide, Rodenticide Act (FIFRA) sides. Is this a unidirectional effort or are there similar efforts going on there? (Note: EPA clarified that the Office of Water and the Office of Chemical Safety and Pollution Prevention (OCSPP) were part of the strategy for clean, safe water. For example - in Toxics Substance Control Act area – the Administrator is working with Congress to re-authorize the TSCA, but is developing action plans under the current laws. EPA also held a forum on clean water issues in May (Coming Together for Clean Water can be reviewed at <http://blog.epa.gov/waterforum/>)
- It is imperative to find a way to get EPA’s Office of Research and Development (ORD) to do research that is supportive of the regulatory decisions that EPA has to make. ORD must work to provide relevant information to the drinking water program. The Science Advisory Board met with ORD in Research Triangle Park (RTP). With all the research ORD was doing, very little of it was being done that was necessary to solve drinking water issues. (Note: EPA clarified that the Agency has a research plan. We work with ORD regarding research and our needs. There is work that ORD does that tie to drinking water program and work that does not tie directly to drinking water program.)
- Existing contaminants on the Contaminant Candidate List (CCL) and some on the preliminary CCL would be a natural place to start looking for groupings, since EPA and the drinking water community have done so much work on compiling this list.
- EPA should also look to what the European community and what other countries are doing to protect drinking water sources. The REACH program and precautionary principle approach differ from our approach.

OPEN SESSION: SHARE ACCESS TO ALL PWS DATA

EPA Questions:

- What do you think are the opportunities and barriers to public water systems submitting data electronically to states?
- Do you have ideas about how EPA should share occurrence data with the public to communicate the quality of drinking water transparently?
- What concerns do you have about EPA receiving all the data systems report to the states?
- How can systems and EPA ensure data quality?

Participant Responses:

- Why is this necessary, since States upload data quarterly? People can look up compliance data on web. I have a concern that when occurrence data are shared it can be misunderstood or misinterpreted – raw data are not information. State staffs are well

trained in how to interpret the lab data but the general public is not. I do not want to use our limited resources to deal with these misunderstandings. In some states, the regulations and requirements are very different, and they are misunderstood. EPA needs to continue to work with ASDWA to make it possible and minimize impact to state programs. (EPA clarified that they receive violation data for compliance, but not in terms of levels of contaminants found when under the maximum contaminant level - EPA does not get the monitoring data.)

- I will not name the company, but a vendor archives water quality data for Health Canada and the data are retrievable. EPA may want to collaborate with Health Canada. We are also working with CA, and they are also archiving data but that has not worked well. The point is – there are data collection systems out there (Health Canada) that are working, and some that are not working (CA).
- The data transfer of the Unregulated Contaminant Monitoring Rule (UCMR) works great. However, UCMR2 only deals with a short-list of 30 or so contaminants. If we are talking about a much larger database, the transfer may become a workload issue. It would be great if PWSs can quality control and quality assurance (QA/QC) data.
- There needs to be a common platform for States to report data. States need to make sure the data is reviewed for QA/QC, to make sure there is not decimal errors, etc. First step should be a common platform.
- I see a problem. The data you will see is the data that was generated using the approved methods at that time. The comparability of the methods and data are in serious doubt. There may be a big assortment of problems that range from the capability of methods and comparability of data.
- Still have to get every small system to buy a computer.
- There are challenges. For example, the Lead and Copper Rule has a 90th percentile action level. How do we make that transparent to the public? It is impossible for people to understand and for people to explain. Who is going to take the time to explain that?
- Collecting and warehousing data is great. My questions are: How will the data be used? For what purposes? Establishing those goals prior to collecting the data is going to be very important.
- We will need to consider how the MCL is used differently. The MCL to most of the public means a single value that must not be exceeded. When we use it for chronics, it is confusing when looking at data (i.e., annual averaging). MCLs for chronic contaminants are hard to understand for the public.
- We will need to use a common vocabulary and plain language to share information with the public.

OPEN SESSION WRAP-UP

EPA posed a question to wrap up the listening session and encouraged audience to consider the thoughts and comments they have heard for each of the four principles. The last question...If you were the Office of Ground Water and Drinking Water, what would you do next?

Participant Responses:

- Maintain an open, transparent process involving experts to create meaningful solutions, keeping the public health goal in focus and an open mind.
- Treat contaminants by source end use; minimize wastewater impacts – Clean Water Act (CWA) efforts.
- Try to simplify regulatory approach before we figure out process. I am not convinced this approach will expedite process.
- Some things will make sense to regulate as groups and will not make sense. EPA should also use a carrot and stick approach. Force fitting groups may not be the answer - you will need to find middle ground.
- Can we use medical community to assess risk? Actual risk vs. Perceived risk. Also, rather than new treatment technologies, how about optimizing what is already there for sustainability.
- Regulating contaminants as groups means different things to different people. What groups are we looking at? We need to define these groups. (e.g., uses, treatment technology, chemical similarities, etc.)
- Given the timeframe (fall 2010) for the strategy – recommend just putting together a general strategy for the Administrator with a roadmap for future strategy development. Set goals, objectives, and roadmap. Do not get too specific at this point.
- Affordability for small systems must be taken into consideration. Arsenic is an example. Large systems can handle this, small systems cannot.
- EPA needs to collaborate with the states. Spend so much time correcting data-would have to do double work. Integration of SDWA/CWA is critical. In addition, we are worried about treating for contaminants with a perceived risk, without knowing what endocrine disruptors break down into, and whether they are treated.
- CWA/SDWA integration – work on source water protection.
- Looking at groups is worth exploring further, but including a source water protection component must be part of the conversation. We need to keep contaminants out of the waste stream.
- I agree EPA should focus on source water protection controls and using green infrastructure.
- Is the goal to identify one group for this fall? Identify a pilot group that we can run through this process, to see how that works before we move forward on a wide-scale basis.

- Taking a holistic approach to water quality and risk reduction (source to tap) should be a good strategy to consider. Probably do not want to throw out current regulations – there are good things like disinfection byproduct (DBP) precursor removal, which reduces DBPs. Total organic carbon (TOC) is a good surrogate for DBPs. Lastly, operators struggle when you give them complex technologies. We need operator-friendly technologies.
- Our state has had its drinking water data online since 1990's. Do not have to do any explaining of data. If EPA provides platform, we will provide data. Source water protection is a key consideration.
- Operators want breathing room from EPA– time to optimize treatment, States have turnover. That is where to start.
- EPA should form focus groups, (e.g. medical perspective, utility perspective, other) and have each group develop a contaminant list.
- Source water protection is important; triazine group is something we need to deal with; endocrine disruptors, pharmaceuticals and personal care products (PPCPs) – if it is there, the public believes it will hurt them, and since we can now measure very low levels, we need research on health effects.
- Think this EPA listening session is a great start. EPA has a challenge, and it is great that they are doing this.
- Look at the contaminants that we regulate and make sure we maintain the ability to meet those and stay in compliance.
- EPA really needs to focus on source water protection. If we keep allowing our sources to be polluted, then we will continue to need new technologies to treat the contaminated source water.
- In Europe, in order to use a chemical, they must prove that there is no harm from it before they can use it. Before a treatment is implemented, they must prove its efficacy.
- Report to Administrator how much EPA and the utilities are already doing right now. We are already dealing with many contaminants (inorganics, volatile organic chemicals, semi volatile chemicals, disinfection byproducts, radionuclides, etc.) We can tweak it and make it better, but in many ways we are already doing that. We are already working with mixtures.
- Water Research Foundation (WRF) has a study underway to give feedback to EPA on these issues.
- Do not throw away all of the information that we have already gathered. Review data gathered in the CCL process. This might be a good way for us to learn from existing data rather than learning from scratch.
- Implementation Considerations: Think about easy outs in rules, so that systems can get out easily if contaminant is not found; also – look at surrogates for contaminants.
- Suggest grouping by treatment, modalities and source water protection strategies, and operators can focus on doing their job, rather than jumping from one thing to another

Ms. Dougherty thanked everyone for coming to this first EPA Drinking Water Strategy listening session. She reminded the audience that there will be more opportunities for them to provide input. EPA plans to hold an additional listening session and expert meetings. Also, a fall stakeholder meeting is being planned. EPA's goal is to keep people updated and provide opportunities to obtain additional input from the public and stakeholders. Ms. Dougherty urged the audience to watch EPA's website for upcoming opportunities to provide input.

A New Vision for Clean, Safe Drinking Water

AWWA Annual Conference and Exposition
June 22, 2010

Cynthia Dougherty, Director
Office of Groundwater and Drinking Water



Today's Listening Session

- 4:00 - 4:15 Overview
- 4:15 - 4:30 Addressing Contaminants as Groups
- 4:30 - 4:45 Fostering Drinking Water Technology
- 4:45 - 5:00 Using Other Authorities
- 5:00 - 5:15 Sharing More Complete Data
- 5:15- 5 :30 Additional questions and Wrap up

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Drinking Water Strategy

- Address contaminants as groups rather than one at a time.
- Foster development of new drinking water treatment technologies.
- Use the authority of multiple statutes to help protect drinking water.
- Partner with states to share more complete data from monitoring at public water systems.

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Goals for the New Vision

By pursuing these actions, EPA will:

- Provide more robust public health protection in an open and transparent manner.
- Assist small communities to identify cost and energy efficient treatment technologies.
- Build consumer confidence by providing more efficient sustainable treatment technologies to deliver safe water at a reasonable cost.

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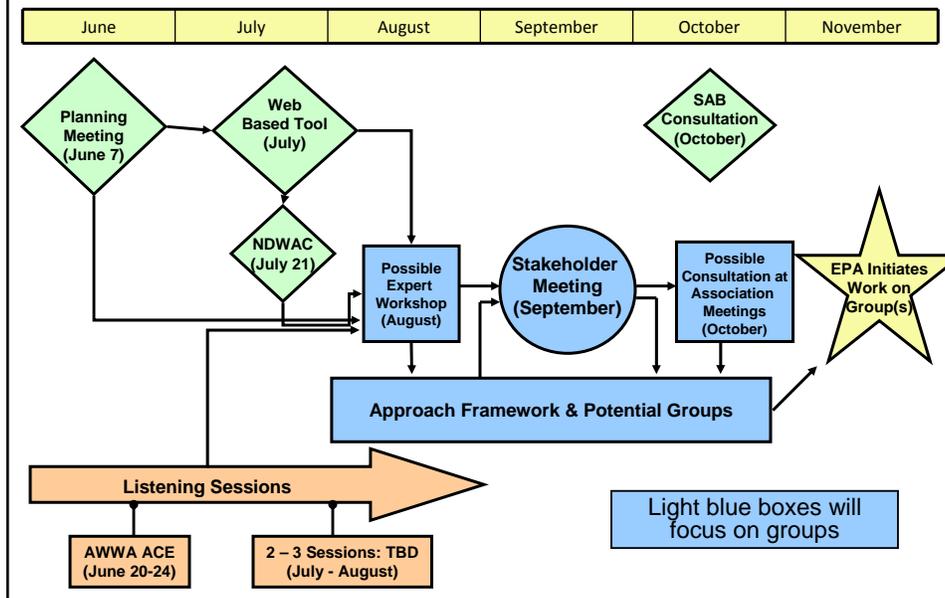
Address Contaminants as Groups

- Engage stakeholders and the public to develop technical and procedural approaches.
 - Planned outreach activities through the summer.
 - Host web-based discussion forums within the next month.
 - Share initial EPA ideas and get your ideas.
- Use ideas and approaches to address contaminants as groups to develop a framework.
- Use framework to address groups of similar contaminants to develop drinking water regulations.

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Outreach on the Drinking Water Strategy





Address Contaminants as Groups

- What are some potential approaches for addressing contaminants as groups?
- What are some factors that EPA should consider in deciding what makes a good group?
- What are the key (2-3?) technical challenges?
- What are the key (2-3?) implementation challenges?
- Can you provide examples of contaminant groups (2-3?) that may present a meaningful opportunity to protect public health and reduce risk?

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Develop New Technologies

- Foster development of new drinking water technologies to:
 - Address health risks posed by a broad array of contaminants.
 - Control contaminants that confront utilities today and into the future.
 - Provide sustainable safe drinking water at reasonable costs
 - Develop water- and energy-efficient treatment technologies
- Collaborate with universities, technology developers, and the private sector.

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Develop New Technologies

- What technological approaches and contaminants will confront utilities in the future? What technologies should we consider for small systems to meet those challenges?
- What do utilities want to see in technologies that could address broad arrays of multiple contaminants in large and small systems?
- What are the drivers utilities consider when evaluating whether or not to install advanced treatment technologies?
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- Are utilities interested in removing unregulated contaminants? What would have to be proven for the individual or mixtures of contaminants?

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Use Other Authorities

- Identify opportunities to better understand and improve drinking water quality.
- Provide relevant health effects and exposure data.
- Ensure that decisions made under other authorities are protective of drinking water.
 - Use reviews under the Federal Insecticide, Fungicide, Rodenticide Act (FIFRA) to tighten pesticide registration requirements when occurrence data approaches or exceeds levels of concern.
 - Use the Toxic Substance Control Act to ensure that decisions made for new and existing industrial chemicals are protective of drinking water.

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Use Other Authorities

- EPA is focusing on regulated contaminants and those that are on the CCL3, are there other pesticides or chemicals in commerce you believe EPA should focus on?
- EPA has the ability to limit or restrict the use of chemicals, if warranted. What kind of requirements or criteria should EPA consider for chemical contaminants using authorities other than SDWA?
- How often and who should be conducting monitoring to determine occurrence? Should it be states, PWS, or pesticide manufacturers?
- What other opportunities do you suggest for EPA to use authorities to protect drinking water?

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Share Access to All PWS Data

- Partnering with states to develop shared access to all public water systems monitoring data.
- Developing information technology, data analysis, and communication tools with states to:
 - Target public health issues, conduct program oversight, and provide compliance assistance.
- Provide timely information about the quality of drinking water and performance of drinking water systems.

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Share Access to All PWS Data

- What do you think are the opportunities and barriers to public water systems submitting data electronically to states?
- Do you have ideas about how EPA should share occurrence data with the public to transparently communicate the quality of drinking water?
- What concerns do you have about EPA receiving all the data systems report to the states?
- How can systems and EPA ensure data quality?

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