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Steve Wyatt
Municipal Technical Advisory Service

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August 27, 2007

REMINDER OF STAGE 2 DISINFECTANTS AND DISINFECTION BYPRODUCTS RULE

Steve Wyatt, Utility Operations Consultant

The Environmental Protection Agency's (EPA) Stage 2 Disinfectants and Disinfection Byproducts Rule (DDBPR) is an amendment to the 1974 Safe Drinking Water Act. It became a federal law on December 15, 2005, and was published in the Federal Register as a National Primary Drinking Water Regulation on January 4, 2006. For a great number of community water systems in Tennessee, the deadline to begin complying with the rule is fast approaching. (The table near the end of this Hot Topic lists deadlines by population served.)

The rule applies to any community or nontransient, noncommunity water system that adds or delivers water that is treated with a primary or residual disinfectant other than ultraviolet light.

Disinfecting drinking water using chlorine has the potential of creating trihalomethanes (TTHM) or haloacetic acid (HAA5) compounds. Water systems in Tennessee are regulated by the Tennessee Department of Environment and Conservation (TDEC), Division of Water Supply. Section 1200-5-1-17 (4) states:

Chlorine is the recommended disinfection agent. All community water systems using ground water as a raw water source and serving more than 50 connections or 150 persons shall continuously chlorinate (unless other disinfection methods are approved) and shall maintain a free chlorine residual in all parts of the distribution system

in the amount of not less than 0.2 mg/L. Public Water Systems using surface water shall continuously chlorinate and maintain a free chlorine residual of 0.2 mg/L in all parts of the distribution system.

Most community water systems in Tennessee have been monitoring for Stage 1 DDBPR. Water systems serving populations of over 50,000 have started the initial requirements for Stage 2 DDBPR.

Stage 2 DDBPR requires a water system to:

- Perform an Initial Distribution System Evaluation (IDSE), which is used to determine representative locations for high TTHM and HAA5;
- Submit a sample plan for stage compliance using the locations determined in the Initial Distribution System Evaluation;
- Sample and monitor the new locations using a locational running average for TTHM and HAA5; and
- Be in compliance for each compound group by the compliance deadline. The maximum contaminant level for TTHM is 0.080 mg/L and for HAA5 is 0.060 mg/L (TTHM is 80 parts per billion; HAA5 is 60 parts per billion).

The rule has staggered implementation deadlines based upon the population served by the water system, as shown in the following table.

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POPULATION SERVED BY THE WATER SYSTEM				
Requirement	100,000+	50,000–99,999	10,000–49,999	<10,000
Submit IDSE plan or 40/30 certification or small system waiver	Oct. 1, 2006	Apr. 1, 2007	Oct. 1, 2007	Apr. 1, 2008
Complete IDSE monitoring	Sept. 30, 2008	Mar. 31, 2009	Sept. 30, 2009	Mar. 31, 2010
Submit IDSE report	Jan. 1, 2009	July 1, 2009	Jan. 1, 2010	July 1, 2010
Begin compliance monitoring	April 1, 2012	Oct. 1, 2012	Oct. 1, 2013	Oct. 1, 2013

Some systems may qualify for a waiver of the Initial Distribution System Evaluation. To qualify the system must have eight consecutive quarters of data that show TTHM values below 0.040 mg/L and HAA5 values below 0.030 mg/L. The water system must comply with the remainder of the rule. Some extremely small systems also may be exempt on portions of the rule.

EPA has guidance documents available to help water systems comply with this rule. You can find them at <http://www.epa.gov/safewater/disinfection/stage2/compliance.html>. Staff from the TDEC Division of Water Supply also are available in each regional office to answer questions and assist water systems with compliance.

MUNICIPAL TECHNICAL ADVISORY SERVICE

Knoxville (Headquarters) . . . (865) 974-0411	Jackson (731) 423-3710
Johnson City (423) 854-9882	Nashville (615) 532-6827
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