



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
WATER AND WATERSHEDS

November 29, 2011

Paula J. Wilson
Hearing Coordinator
Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Dear Ms. Wilson:

Thank you for providing the opportunity to review a copy of the Negotiated Rule Draft No. 2. My comment pertains to the Maximum Log Removal table found in section 300.02.b on pages 27 - 28.

Previously the table only identified maximum log removal credit for Giardia and viruses. The table now also identifies maximum log removal credit for Cryptosporidium. The National Primary Drinking Water Regulations do not identify maximum log removal credit values in 40 CFR Part 141. However, suggested maximum log removal credits for conventional filtration, direct filtration, slow sand filtration, and diatomaceous earth filtration are provided in various guidance documents (see e.g., Table 7-2 on page 62 of the Environmental Protection Agency's "LT1ESWTR Disinfection Profiling and Benchmarking Technical Guidance Manual" for Giardia and virus maximum log removal credit) and regulatory preamble language (see e.g., page 678 of the preamble to the Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR) which describes how much Cryptosporidium removal filtration plants can achieve).

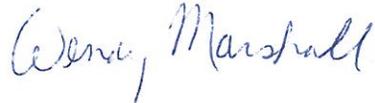
The Giardia and virus maximum log removal credit allowed for conventional, direct, slow sand, and diatomaceous earth filtration, as provided in Negotiated Rule Draft No. 2, is in agreement with the log removal credit suggested by EPA. However, the Cryptosporidium maximum log removal credits allowed for conventional, direct, slow sand and diatomaceous earth filtration in Negotiated Rule Draft No. 2 are lower than the Cryptosporidium maximum log removal credits allowed for conventional, direct, slow sand, and diatomaceous earth filtration as found in the preamble to the LT2ESWTR. You may want to consider changing these Cryptosporidium log removal credit values to 3.0 for conventional filtration, slow sand filtration, and diatomaceous earth filtration, and to 2.0 for direct filtration.

EPA recognizes that one might expect that the Giardia log removal credits would be larger or at least equal to the Cryptosporidium log removal credits, given that Giardia are larger than Cryptosporidium. However, the Giardia (and virus) log removal credits were established many years prior to the drafting of the LT2ESWTR which is when the Cryptosporidium log removal credits were established. Because the LT2ESWTR does not address Giardia, EPA was not able

to update Giardia log removal credits while establishing Cryptosporidium log removal credits so the Giardia log removal credits remain lower than what one might expect.

If you have any questions pertaining to this comment, please feel free to contact me at marshall.wendy@epa.gov or (206) 553-1890.

Sincerely,



Wendy Marshall
Environmental Scientist
Drinking Water Unit

cc: Mike Piechowski, DEQ