

Message

From: Tracy Mehan [tmehan@awwa.org]
Sent: 8/9/2018 3:19:54 PM
To: Tracy Mehan [tmehan@awwa.org]
Subject: FW: Nothing regulated under the Safe Drinking Water Act since 1996?
Attachments: Safe Drinking Water Regulations since 1996.docx

Dear Colleagues,

You may recall that I addressed this question back in May and welcomed in put on our research addressing what AWWA staff perceived as a an urban legend of sorts. We thank all of you who took the time to communicate your ideas, criticisms, feedback, etc. We have now come up with a second, expanded draft document which continues the discussion, a copy of which is attached for your review and comment.

Among the interesting factoids are these:

*Since 1996 the we calculate the total regulatory burden for post-1996 SDWA regulations is \$2.8 billion each year.

“No other federal environmental statute managed by the U.S. Environmental Protection Agency has promulgated as many standards targeting the same regulated entities over this period.” Again, we welcome your feedback to help us groundtruth this claim.

*EPA has also published 15 drinking water health advisories, some of which, functionally, have regulatory impact.

*There have been five rulemakings to collect data.

*See the argument that most delay or lack of regulatory activity is due to insufficient resources as documented by the Association of State Drinking Water Administrators (last page of attachment).

Again, your comments, criticisms, data and overall input is most welcome as we try to improve upon this analysis. Let us hear from you. Thank you.

Tracy

G. Tracy Mehan, III
Executive Director, Government Affairs
American Water Works Association

Ex. 6 (direct)

Attachment

From: Tracy Mehan
Sent: Thursday, May 17, 2018 12:54 PM
To: Tracy Mehan <tmehan@awwa.org>
Subject: Nothing regulated under the Safe Drinking Water Act since 1996?

Dear Colleagues,

I have heard it said, often, around town that EPA has not done any regulation of drinking water since the 1996 reauthorization of the Safe Drinking Water Act other than arsenic. I have asked my staff to look into this claim. While we are still researching the question, and want to add some regulatory cost figures to the inventory, a preliminary, i.e, tentative, list of regulations issued under the SDWA, since 1996, looks like this:

- *Arsenic Rule
- *Radionuclides Rule
- *Backwash Recycle Rule
- *Stage 1 Disinfectants and Disinfection Byproducts Rule
- *Stage 2 Disinfectants and Disinfection Byproducts Rule
- *Interim Enhanced Surface Water Treatment Rule
- *Long-Term 1 Enhanced Surface Water Treatment Rule
- *Long-Term 2 Enhanced Surface Water Treatment Rule
- *Groundwater Rule
- *Revised Total Coliform Rule

These are now part of a list of 97 (by my count) parameters or contaminants regulated under Safe Drinking Water Act. In addition, we have seen several (many?) Health Advisories issues that often have the impact of de facto regulations, e.g, PFAS.

I will be reporting further on our research. But it seems that the idea that nothing has been regulated under the SDWA, since '96, is a bit of an overstatement. In the meantime, if I am missing something, or have made an error, please let me hear from you (I will be out of the office on vacation until May 29th).

Thanks.

Tracy

G. Tracy Mehan, III
Executive Director, Government Affairs
American Water Works Association

Ex. 6 (direct)

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