

Lindsey Hallock

From: Jim Flechtner
Sent: Friday, June 8, 2018 12:07 PM
To: Gary.Perlmutter@ncdenr.gov
Cc: Beth Eckert; Lindsey Hallock; Carel Vandermeijden; Frank Styers; Peg Hall Williams
Subject: Draft Permit Comment

Mr. Perlmutter,

Cape Fear Public Utility Authority (CFPUA) provides drinking water to approximately 200,000 people in the City of Wilmington and greater New Hanover County. We maintain and operate three drinking water systems, and our largest system uses the Cape Fear River as its source water. After reviewing the City of Asheboro's draft NPDES permit, we have concerns regarding the draft 1,4 Dioxane permit limit of 149 ug/L and its potential to impact our community's drinking water supply.

The EPA has established a lifetime drinking water health advisory level for this compound of 200 ug/L and a health advisory for one in ten thousand cancer risk at 35 ug/L. While health advisory levels are non-enforceable, they are meant to provide public water suppliers with necessary guidance to ensure they are protecting public health to the best of their ability.

Many water treatment plants are not able to remove 1,4 Dioxane. Others, such as our Sweeney Water Treatment Plant, remove approximately 66% (on average) of the concentration that enters our intake at Lock & Dam #1. As a result, many of the public drinking water intakes downstream of this segment of the basin will have the potential to be impacted by the discharge of this compound.

In developing permit limits for 1,4-Dioxane in the City of Asheboro discharge, we ask that the Division of Water Resources (DWR) consider both the designated uses of the river downstream of this discharge location and other sources of this compound that may be affecting levels in the River. Treating for these compounds at the source, in a manner consistent with existing drinking water health advisory levels, will minimize impacts to downstream communities that may otherwise be required to install or increase treatment at the cost of their communities to ensure protection of public health.

Additionally, because the existence of 1,4 Dioxane in wastewater discharge has been recognized for several years, we request the draft compliance timeline of three years should be reduced to ensure downstream exposure to this compound is minimized as quickly as possible.

Asheboro's NPDES permit is the first of several that may be issued this summer that will address 1,4-Dioxane levels. We appreciate the efforts of DWR to communicate with other users of the River, and to issue limits for compounds such as 1,4-dioxane. CFPUA believes it is important to address this issue comprehensively by considering water supply uses throughout the Cape Fear River Basin.

Regards,

James R. Flechtner, PE
Executive Director
Cape Fear Public Utility Authority
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