



James R. Flechtner, PE
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By email to: michael.regan@ncdenr.gov

By USPS to:
Secretary Michael S. Regan
Department of Environmental Quality
217 West Jones St.
Raleigh, North Carolina 27603

Secretary Regan,

Over the past year, the discovery of emerging contaminants in the Cape Fear River has led to widespread concerns over water quality in our community. Cape Fear Public Utility Authority (CFPUA) has followed the actions the North Carolina Department of Environmental Quality (NCDEQ) has taken to address the compound GenX, and is pleased to report that levels of the compound continue to decrease in our finished water.

We know, however, that there are other emerging contaminants in need of regulatory attention that have been detected in the drinking water of communities in the Lower Cape Fear region. One such emerging contaminant is 1,4 Dioxane.

The Environmental Protection Agency has named 1,4 Dioxane as a likely human carcinogen, and a health advisory level of 200 ug/L has been established for the compound. While CFPUA's Sweeney Water Treatment Plant is able to remove approximately 66 percent of the compound through the ozonation process and ultra-violet treatment, water treatment plants that do not have advanced treatment technologies are not able to reduce levels of 1,4 Dioxane in the finished water.

NCDEQ's Division of Water Resources recently issued a draft limit for 1,4 Dioxane of 149 ug/L in the City of Asheboro's draft NPDES permit—a level that is nearly 75 percent of the compound's health advisory level in drinking water and over four times higher than the health advisory level for a one in ten thousand cancer risk. Additionally, we know that the City of Asheboro is not the only source of this compound. Thus, downstream users of the River will be faced with treating combined levels of 1,4 Dioxane from multiple sources.

As is the case with most emerging contaminants, many water treatment plants were not designed to remove 1,4 Dioxane from drinking water. As a result, CFPUA believes the best way to address compounds with the potential to negatively impact public health is to treat them at the source. We ask that NCDEQ consider all downstream uses of the Cape Fear River and place discharge limits in line with EPA's existing health advisory level on all known sources of 1,4 Dioxane.

Regards,

A handwritten signature in blue ink, appearing to read "J. R. Flechtner". The signature is fluid and cursive, with the first name "James" being more legible than the last name "Flechtner".

James R. Flechtner, PE