

SRF funds to implement measures to prevent and control non-point source pollution. Detailed sanitary surveys, with a specific analysis of sources of *Cryptosporidium* in the watershed, will facilitate the process of targeting funding available under SRF programs to eliminate or mitigate these sources.

c. *Request for comment.* EPA requests comment on the proposed watershed control program credit and associated program components.

- Should the State be allowed to reduce the frequency of the annual watershed survey requirement for certain systems if systems engage in alternative activities like public outreach?

- The effectiveness of a watershed control program may be difficult to assess because of uncertainty in the efficacy of control measures under site-specific conditions. In order to provide constructive guidance, EPA welcomes reports on scientific case studies and research that evaluated methods for reducing *Cryptosporidium* contamination of source waters.

- Are there confidential business information (CBI) concerns associated with making information on the watershed control program available to the public? If so, what are these concerns and how should they be addressed?

- How should the “area of influence” (the area to be considered in future watershed surveys) be delineated, considering the persistence of *Cryptosporidium*?

### 3. Alternative Source

a. *What is EPA proposing today?* Plant intake refers to the works or structures at the head of a conduit through which water is diverted from a source (e.g., river or lake) into the treatment plant. Plants may be able to reduce influent *Cryptosporidium* levels by changing the intake placement (either within the same source or to an alternate source) or managing the timing or level of withdrawal.

Because the effect of changing the location or operation of a plant intake on influent *Cryptosporidium* levels will be site specific, EPA is not proposing any presumptive credit for this option. Rather, if a system is concerned that *Cryptosporidium* levels associated with the current plant intake location and/or operation will result in a bin assignment requiring additional treatment under the LT2ESWTR, the system may conduct concurrent *Cryptosporidium* monitoring reflecting a different intake location or different intake management strategy. The State will then make a determination as to whether the plant

may be classified in an LT2ESWTR bin using the alternative intake location or management monitoring results.

Thus, systems that intend to be classified in an LT2ESWTR bin based on a different intake location or management strategy must conduct concurrent *Cryptosporidium* monitoring. The system is still required to monitor its current plant intake in addition to any alternative intake location/management monitoring, and must submit the results of all monitoring to the State. In addition, the system must provide the State with supporting information documenting the conditions under which the alternative intake location/management samples were collected. The concurrent monitoring must conform to the sample frequency, sample volume, analytical method, and other requirements that apply to the system for *Cryptosporidium* monitoring as stated in Section IV.A.1.

If a plant's LT2ESWTR bin classification is based on monitoring results reflecting a different intake location or management strategy, the system must relocate the intake or implement the intake management strategy within the compliance time frame for the LT2ESWTR, as specified in section IV.F.

b. *How was this proposal developed?* In the Stage 2 M-DBP Agreement in Principle, the Advisory Committee identified several actions related to the intake which potentially could reduce the concentration of *Cryptosporidium* entering a treatment plant. These actions were included in the microbial toolbox under the heading Alternative Source, and include: (1) Intake relocation, (2) change to alternative source of supply, (3) management of intake to reduce capture of oocysts in source water, (4) managing timing of withdrawal, and (5) managing level of withdrawal in water column.

It is difficult to predict in advance the efficacy of any of these activities in reducing levels of *Cryptosporidium* entering the treatment plant. However, if a system relocates the plant intake or implements a different intake management strategy, it is appropriate for the plant to be assigned to an LT2ESWTR bin using monitoring results reflecting the new intake strategy.

EPA believes that the requirements specified for monitoring to determine bin placement are necessary to characterize a plant's mean source water *Cryptosporidium* level. Consequently, any concurrent monitoring carried out to characterize a different intake location or management strategy should be equivalent. For this reason, the sampling and analysis requirements

which apply to the current intake monitoring also apply to any concurrent monitoring used to characterize a new intake location or management strategy.

EPA also recognizes that if plant's bin assignment is based on a new intake operation strategy then it is important for the plant to continue to use this new strategy in routine operation. Therefore, EPA is proposing that the system document the new intake operation strategy when submitting additional monitoring results to the State and that the State approve that new strategy.

c. *Request for comment.* EPA requests comment on the following issues:

- What are intake management strategies by which systems could reduce levels of *Cryptosporidium* in the plant influent?

- Can representative *Cryptosporidium* monitoring to demonstrate a reduction in oocyst levels be accomplished prior to implementation of a new intake strategy (e.g., monitoring a new source prior to constructing a new intake structure)?

- How should this option be applied to plants that use multiple sources which enter a plant through a common conduit, or which use separate sources which enter the plant at different points?

### 4. Off-Stream Raw Water Storage

a. *What is EPA proposing today?* Off-stream raw water storage reservoirs are basins located between a water source (typically a river) and the coagulation and filtration processes in a treatment plant. EPA is not proposing presumptive treatment credit for *Cryptosporidium* removal through off-stream raw water storage. Systems using off-stream raw water storage must conduct *Cryptosporidium* monitoring after the reservoir for the purpose of determining LT2ESWTR bin placement. This will allow reductions in *Cryptosporidium* levels that occur through settling during off-stream storage to be reflected in the monitoring results and consequent LT2ESWTR bin assignment.

The use of off-stream raw water storage reservoirs during LT2ESWTR monitoring must be consistent with routine plant operation and must be recorded by the system. Guidance on monitoring locations is provided in Public Water System Guidance Manual for Source Water Monitoring under the LT2ESWTR (USEPA 2003g), which is available in draft in the docket for today's proposal.

b. *How was this proposal developed?* The Stage 2 M-DBP Agreement in Principle recommends a 0.5 log credit for off-stream raw water storage