

## 2. Specific Locations in Distribution Systems Are Not Protected to MCL Levels

Data from the Information Collection Rule show that the RAA compliance calculation may allow specific locations in a distribution system to regularly receive water with DBP levels that exceed the MCL. Figure IV–3 shows that five percent of plants (15 out of 290) had one or more locations that, on average, exceeded 0.080 mg/L as a TTHM LRAA for that same year. One of the 15 plants

that exceeded a TTHM LRAA of 0.080 mg/L did so at two locations. Of the 15 plants, the highest LRAA was between 0.080 and 0.090 mg/L at 10 plants, and between 0.090 and 0.100 mg/L at 5 plants. Customers served at these locations regularly received water with TTHM concentrations somewhat higher than the MCL.

Figure IV–4 shows similar results based on Information Collection Rule HAA5 data. Three percent of plants (eight of 290) exceeded 0.060 mg/L as an LRAA, and three of these eight plants

did so at two or three locations. Of the 8 plants, the highest LRAA was between 0.060 and 0.070 mg/L at 5 plants, and between 0.070 and 0.075 mg/L at 3 plants. Among the 290 plants in the Information Collection Rule database meeting the Stage 1 MCLs, 19 plants have a maximum TTHM LRAA of 0.080 mg/l or greater or a maximum HAA5 LRAA of 0.060 mg/l or greater (four plants exceeded both MCLs), though in no case did DBP levels at a given location consistently exceed the MCL by more than 20%.