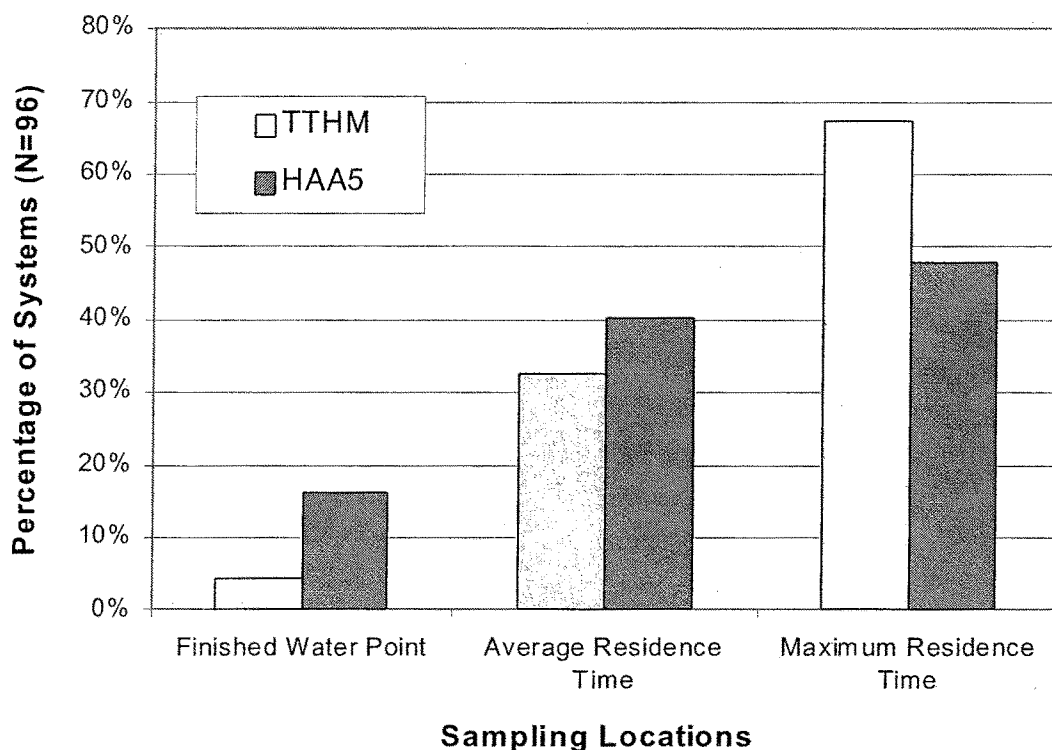


**Figure IV-6 Frequency at Which Highest TTHM or HAA5 Locational Annual Average Concentrations Occurred at Each Monitoring Location in NRW Survey**



**Note:** LRAA calculation is based on the results from two sampling events at each of sampling locations in the NRW survey (winter and summer months). Only plants having monitoring results for both winter and summer months are included in the data set.

EPA also analyzed whether the highest LRAA for TTHM and HAA5 occurred at the same location. If TTHM and HAA5 occur at the same location rather than different locations, fewer monitoring sites would be needed to represent TTHM and HAA5 occurrence. However, this is not the case. The Information Collection Rule and NRW data sets, respectively, indicate that 49% and 44% of plants experienced their highest LRAA TTHM and HAA5 concentrations at different locations in the distribution system.

For plants that did have their highest LRAA TTHM and HAA5 concentrations at the same location, it was not necessarily the maximum residence time monitoring location. Figure IV-7 illustrates that for the Information Collection Rule plants with the highest TTHM and HAA5 levels occurring at the same location, the highest TTHM and HAA5 LRAA simultaneously occurred at the maximum residence time monitoring location in 50% of the cases. Figure IV-8 illustrates that for the NRW plants with the highest TTHM

and HAA5 levels occurring at the same location, the highest TTHM and HAA5 LRAA simultaneously occurred at the maximum residence time (MAX) monitoring location in 64% of the cases.

#### *C. Request for Comment*

EPA requests comment on the analysis presented in this section. Is EPA's approach for representing post Stage 1 DBPR occurrence appropriate? What other approaches might be used? Are the conclusions that EPA derives from the analysis appropriate?