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Subject: Re: Maximum residence time

Summary

The EPA does not give specific guidance on standing times, but mentions it in the preamble of the 1991 rule and in their 1991 guidance manual. The **PREAMBLE** discusses a proposed 8-18 hour standing time and the controversy surrounding the 8 hours. The EPA settled on 6 hours, but did not discuss the upper limit further.

The **GUIDANCE MANUAL** states that water use during the previous day should be typical of daily use when occupied. It also mentions 12 hours as excessively long in a parenthetical statement. Details below.

Details

Preamble: The preamble of the original lead and copper rule (56 FR 26460 dated June 7, 1991) states, "The 1988 proposal would have required systems to collect ...sample at a consumer's tap that has been standing in the interior plumbing for 8 to 18 hours and was collected without prior flushing" (page 26518, column 3, under 2. Sample Collection). However, "numerous commenters were critical of the 8 to 18 hour standing time requirement" (page 26520, column 1 under ii. Standing Time). The EPA responded with reducing the minimum standing time to 6 hours, but no longer addressed the maximum standing time. Later in the preamble, under the public notification and system reporting and recordkeeping requirements section, the EPA notes that the final rule settled on requiring systems to certify that the first draw sample stood motionless for least 6 hours with no further mention of the 18 hours (page 26531, column 1, under a. Tap Monitoring.)

Guidance Manual: The EPA mentions excessive standing times in their guidance manual. "First Draw Tap Samples: Samples can be collected any time as long as the water has stood undisturbed in the pipes for at least 6 hours. Water use during the day before sample collection should have been typical of its daily use when occupied. PWSs should request home owners to indicate when water had last been used in the house prior to sampling and the time that the sample was collected. Estimating the stagnation period may assist PWSs in data interpretation, especially when excessively long stagnation periods are encountered (more than 12 hours)." There is no further mention of excessively long stagnation period (page 4-14 of the Lead and Copper Rule Guidance Manual, Volume I: Monitoring, dated September 1991, Drinking Water Technology Branch, Drinking Water Standards Division, Office of Ground Water and Drinking Water.)