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**CWWA COMMENTS ON
THE GUIDELINES FOR CANADIAN DRINKING WATER QUALITY**

as prepared from submissions by:

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GENERAL

The issues raised herein are based on a number of factors, the most important of which are:-

- . The Canadian "Guidelines" are regarded as "mandatory standards".
- . Our water quality issues are heavily influenced by USA programs and events.
- . Rapidly-occurring new developments are making it increasingly difficult for water authorities to make decisions on new or modified treatment train design.

THE INDUSTRY NEEDS TO BE BETTER INFORMED

- . Many municipalities are addressing potential process modifications, considering new or expanded treatment facilities but,
- . It is difficult to make a responsible decision on the most effective/economic approach with the rather modest amount of information normally available on future Guideline constituent changes.
- . Municipal water officials/engineers must have access to all available information on changes being considered -- not only the designation of constituents under review, but also the RANGE OF LEVELS that are being considered for the Maximum Acceptable Concentrations in each case.
- . For example, DISINFECTANTS AND DISINFECTANT BY-PRODUCTS are a priority for the Drinking Water Subcommittee. We are aware of this (and support it), but this is not sufficient information. Within the context of such a broad set of parameters, water supply officials need to know, for instance:-
 - Potential MAC's for chlorine dioxide, chlorine, chloramine;
 - Will chlorites/chlorates be listed; at what levels?
 - The targeted MAC's for haloacetic acids and bromates must be identified.
 - Will ozone by-products be addressed?

CONSIDERATION OF ECONOMICS AND PRACTICALITY SHOULD CONTINUE TO BE PART OF THE GUIDELINE-SETTING PROCESS

- . Cost/benefit and risk/benefit aspects are most important to the large number of Canada's smaller water systems.
- . The treatment technologies that are considered must be practical for these smaller water systems.
- . MAC levels must reflect the availability of associated analytical techniques (not in the research laboratory, but practically, in the field).

THE GUIDELINE DOCUMENT ITSELF SHOULD BE MODIFIED TO BE MORE USER-FRIENDLY

- . The "Supporting Documentation" is much too detailed for the average user of the Guidelines.
- . The Guideline document itself could incorporate a brief description of the health effects of each parameter, extracted and condensed from the documentation (as in the "Ontario Drinking Water Objectives").

MANY WATER SUPPLY AGENCIES ACROSS CANADA CONTINUE TO BE UNINFORMED, MISINFORMED ABOUT THE GUIDELINES

- . The length of time between publication is too long.
- . The announcement of availability of a new guideline document does not reach many of the right people.
- . There is no effective system for communicating approved constituent changes.

DRINKING WATER ADDITIVES SHOULD BE REGULATED, REGARDLESS OF THE STATUS OF THE PROPOSED CANADIAN DRINKING WATER SAFETY ACT

- . The increasing number of products used in water systems that relate to "indirect" additives is of concern.
- . The quality of water treatment chemicals (direct additives) is becoming more significant to finished water quality as MAC's are added or lowered in the Guidelines.