

Comments on the
Treatment Subcommittee's
“RECOMMENDATION ON
1,4-DIOXANE
TREATMENT OPTIONS
FOR DRINKING WATER”

New Jersey
Drinking Water Quality Institute

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DWQI TREATMENT SUBCOMMITTEE

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DWQI TREATMENT SUBCOMMITTEE

The Treatment Subcommittee is responsible for evaluating best available treatment technologies, or methods, for removal of hazardous contaminants from drinking water.

DWQI TREATMENT SUBCOMMITTEE

- ▶ In December 2018, DWQI moved forward with developing a recommended Maximum Contaminant Level, or MCL, for 1,4-dioxane.
- ▶ At the September 30, 2020 DWQI meeting, the Treatment Subcommittee presented the draft “Recommendation on 1,4-Dioxane Treatment Options for Drinking Water.”
- ▶ A public comment period was held from October 21, 2020 – December 21, 2020.
- ▶ Four comments were submitted that related to the draft Treatment Subcommittee Report.

Comments on Draft Report

Comments on Regulation and Enforcement:

- ▶ “[D]rinking water utilities are adversely impacted by dischargers of 1,4-Dioxane in the implementation of MCLs without enhanced enforcement of industrial dischargers and contaminated sites.”
- ▶ “[G]enerators and dischargers of 1,4-Dioxane must be addressed through the establishment of discharge limits by permit.”

Response: DWQI is an advisory board and has no regulatory or enforcement authority. These are considerations that are outside the charge of the DWQI.

Comments on Draft Report

Comments on Economic Feasibility:

- ▶ “A cost/benefit analysis of treating 1,4-dioxane via AOP in addition to GAC or other techniques to achieve PFAS MCL requirements should be undertaken to ensure the full economic burden of multiple treatment trains (if any) is fully understood...”
- ▶ The DWQI should consider “concerns regarding the...funding and the overall impact to the communities and customers.”

Response: As an advisory board, the DWQI has no regulatory authority and does not decide whether a contaminant is regulated. Although the DWQI Treatment Subcommittee endeavors to identify those treatment techniques that are effective and feasible to achieve the recommended MCL, and to recommend the best available technologies, it is the role of NJDEP to evaluate economic impacts associated with a proposed rule.

Comments on Draft Report

Comments on Timeframe of Regulation:

- ▶ “[I]t is not possible to react to MCLs for PFCs and 1,4-dioxane in such a short time period.”

Response: As an advisory board, the DWQI has no regulatory authority to determine the timeframe for regulation. It is the role of NJDEP to evaluate impacts, initiate rulemaking, and determine the timeframe for compliance.

Comments on Draft Report

Comments on AOP and Bromate formation:

- ▶ “UV AOP does not form bromate as a DBP from bromide. Other AOP processes such as ozone will generate bromate from bromide. ”

Response: The Treatment Subcommittee reviewed this comment and agrees. The Treatment Subcommittee report has been modified to clarify this information.

CONCLUSION

- ▶ The Treatment Subcommittee made one amendment to the report based on the submitted comments, as described in the previous slide.
- ▶ The Treatment Subcommittee concludes that it has been demonstrated that 1,4-dioxane can be reliably and feasibly removed in public water systems by carefully designed AOP treatment to levels below the recommended Health-based MCL of 0.33 µg/L.