



DEPARTMENT OF THE ARMY
WASHINGTON AQUEDUCT
U.S. ARMY CORPS OF ENGINEERS, BALTIMORE DISTRICT
5900 MACARTHUR BOULEVARD, N.W.
WASHINGTON, D.C. 20016-2514

August 6, 2004

Office of the General Manager

Mr. Jon M. Capacasa, Director
Water Protection Division
EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Capacasa:

Thank you for your August 3, 2004 letter providing modifications to your interim Optimal Corrosion Control Treatment (OCCT) designation to accommodate the system-wide addition of a corrosion inhibitor at the Washington Aqueduct treatment plants.

We have had an opportunity to review your letter, and we believe it does an excellent job of summarizing the extensive work that has been accomplished on corrosion control. We do have a couple of important comments and recommendations that we wish to bring to your attention. We ask that you consider these and issue a slight modification to the OCCT letter prior to the initiation of the treatment change later this month.

The interim WQP's for water entering the distribution system give a pH requirement of $7.8 - 7.9 \pm 0.3$. These values appear to be a holdover from the previous OCCT designation to accommodate the way in which we had to devise a special application point for the partial system application of the orthophosphate corrosion inhibitor in WASA's 4th High distribution system. During that period the water leaving the treatment plants did not contain the orthophosphate.

Our understanding is that the recommendations of the Technical Expert Working Group and the Independent Peer Review panel are that a pH of 7.7 would be the best target for water leaving the treatment plant to achieve the desired passivation effects. Therefore, we request you modify the pH Interim WQP on page 8 of your August 3, 2004 letter for *water entering the distribution system during passivation period* to read 7.7 ± 0.3 . Similarly the pH WQP Goal would be 7.7 ± 0.1 .

We would like to clarify the reporting requirements given on page 8 of your letter. Our understanding is that 40 C.F.R. 141.87 requires the primacy agency to establish six-month monitoring periods for determining compliance with WQP's. We suggest that the January through June, and July through December monitoring periods that were previously established be

retained as regulatory monitoring periods. However, we will report WQP data on a monthly basis as you request.

Please contact me at 202-764-0031 or Mr. Lloyd Stowe at 202-764-2702 if you need additional information to consider in making the requested changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas P. Jacobus', with a stylized, flowing script.

Thomas P. Jacobus
General Manager