

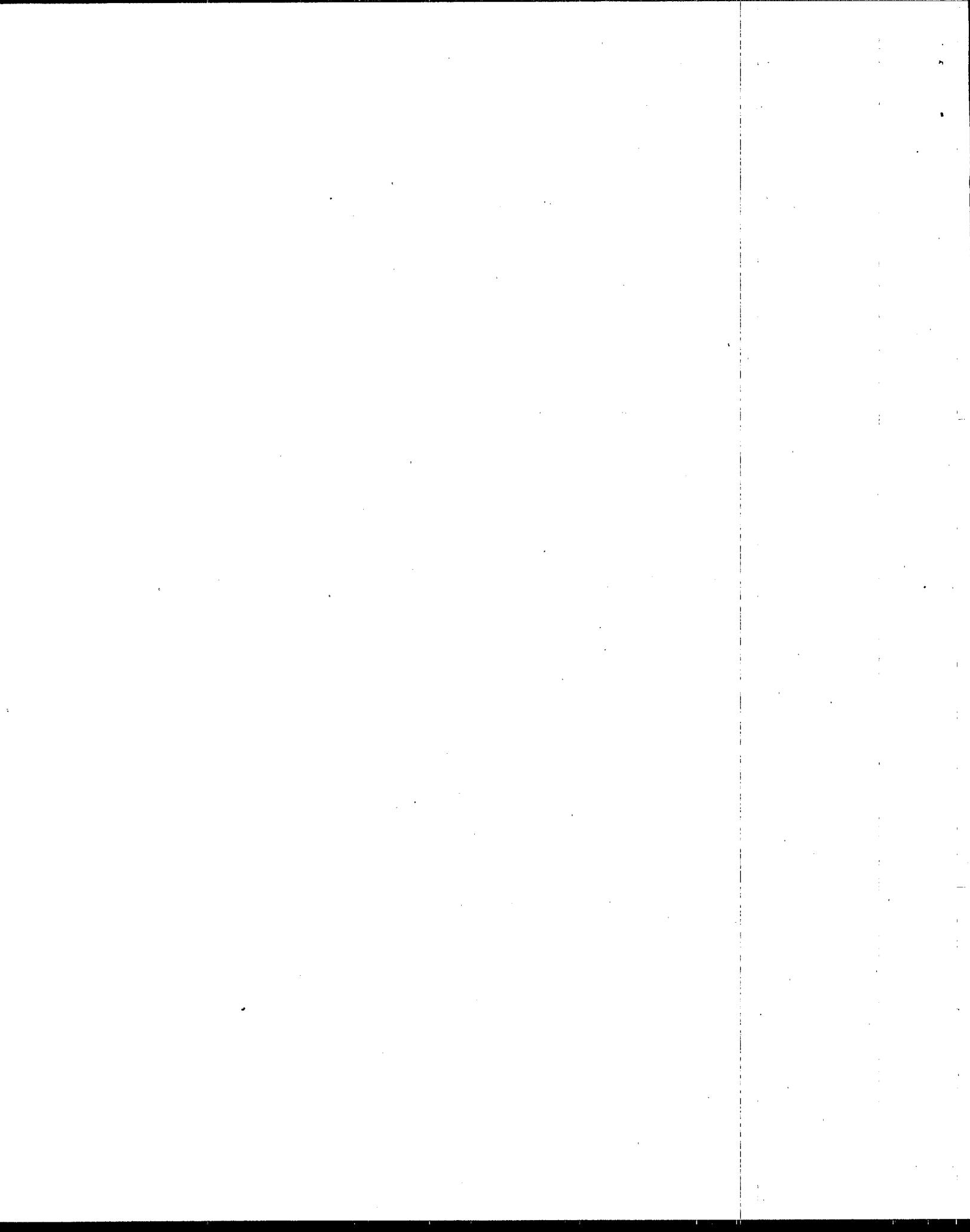
**United States  
Environmental Protection Agency**

EPA 811/R-92-007  
November 1992



# **ANALYSIS OF POTENTIAL TRADE-OFFS IN REGULATION OF DISINFECTION BY-PRODUCTS**

# **EXHIBITS AND APPENDIX MATERIAL**



## **Analysis of Potential Trade-offs In Regulation of Disinfection By-Products**

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**Frank Letkiewicz  
Abt Associates, Inc.**

**Stig Regli & Bruce Macler  
U.S. Environmental Protection Agency**

### **Exhibits & Appendix Material**

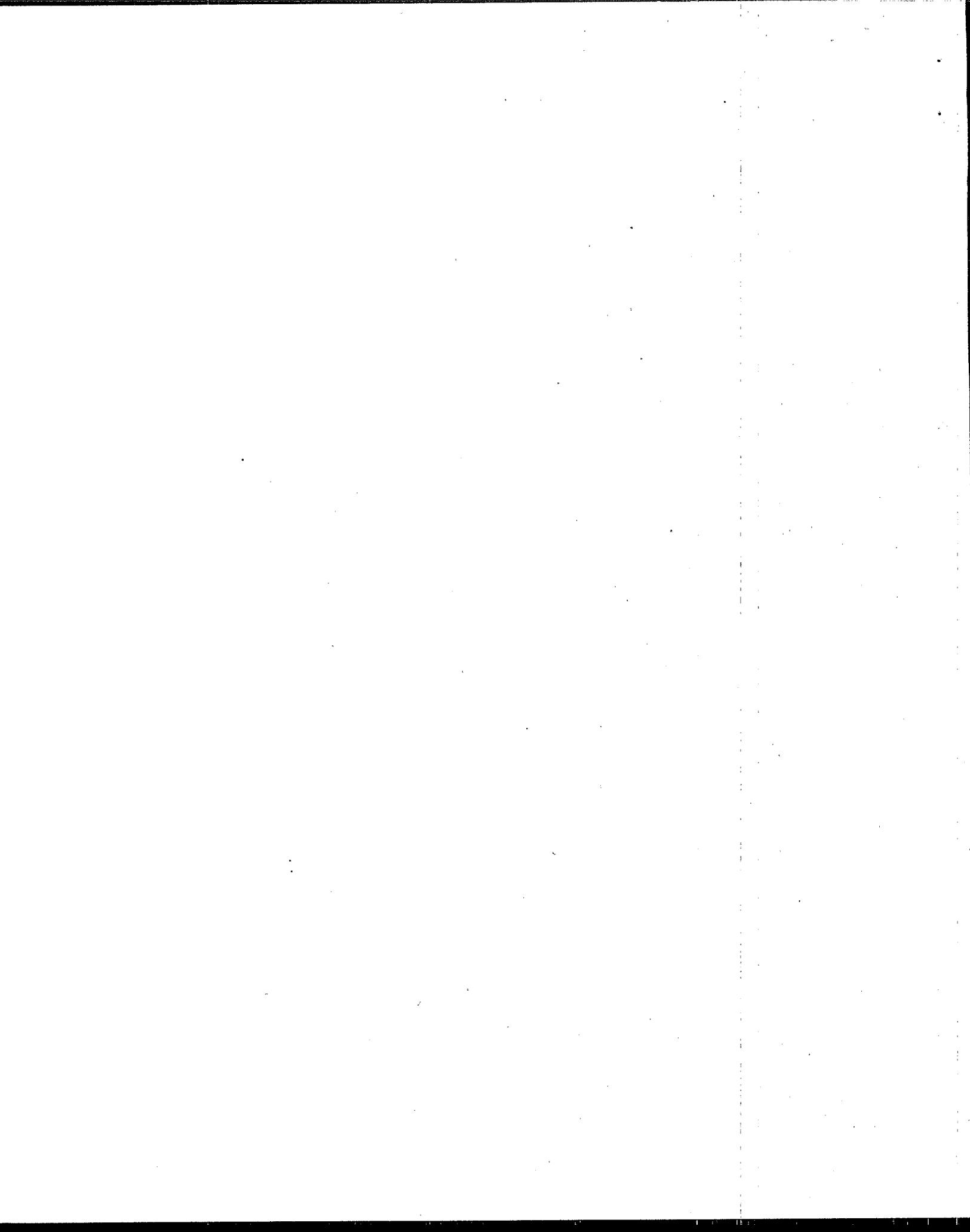


Exhibit 1

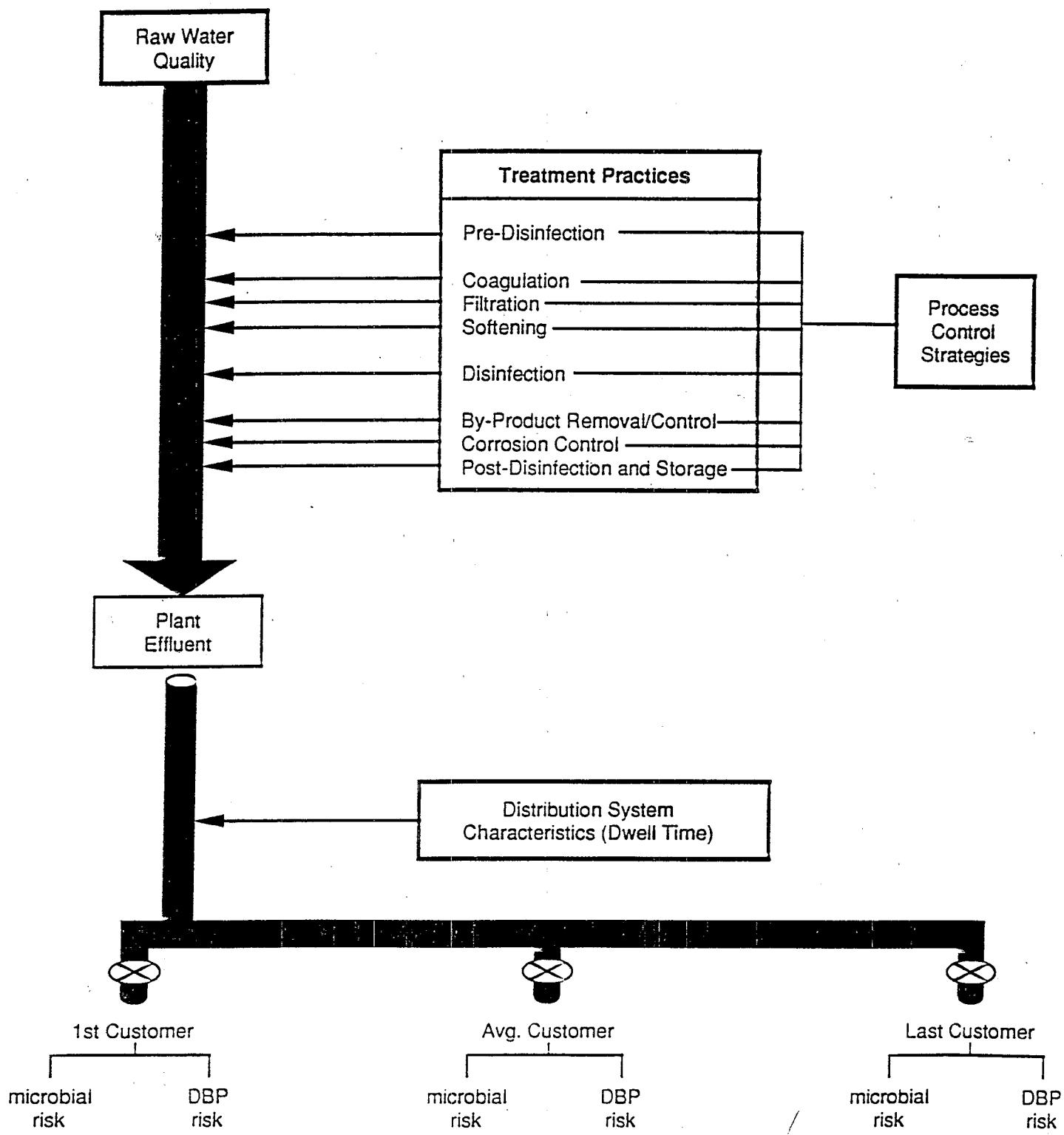


Exhibit 2

Influent Giardia vs. Total Log Reduction (Winter) From LeChevallier

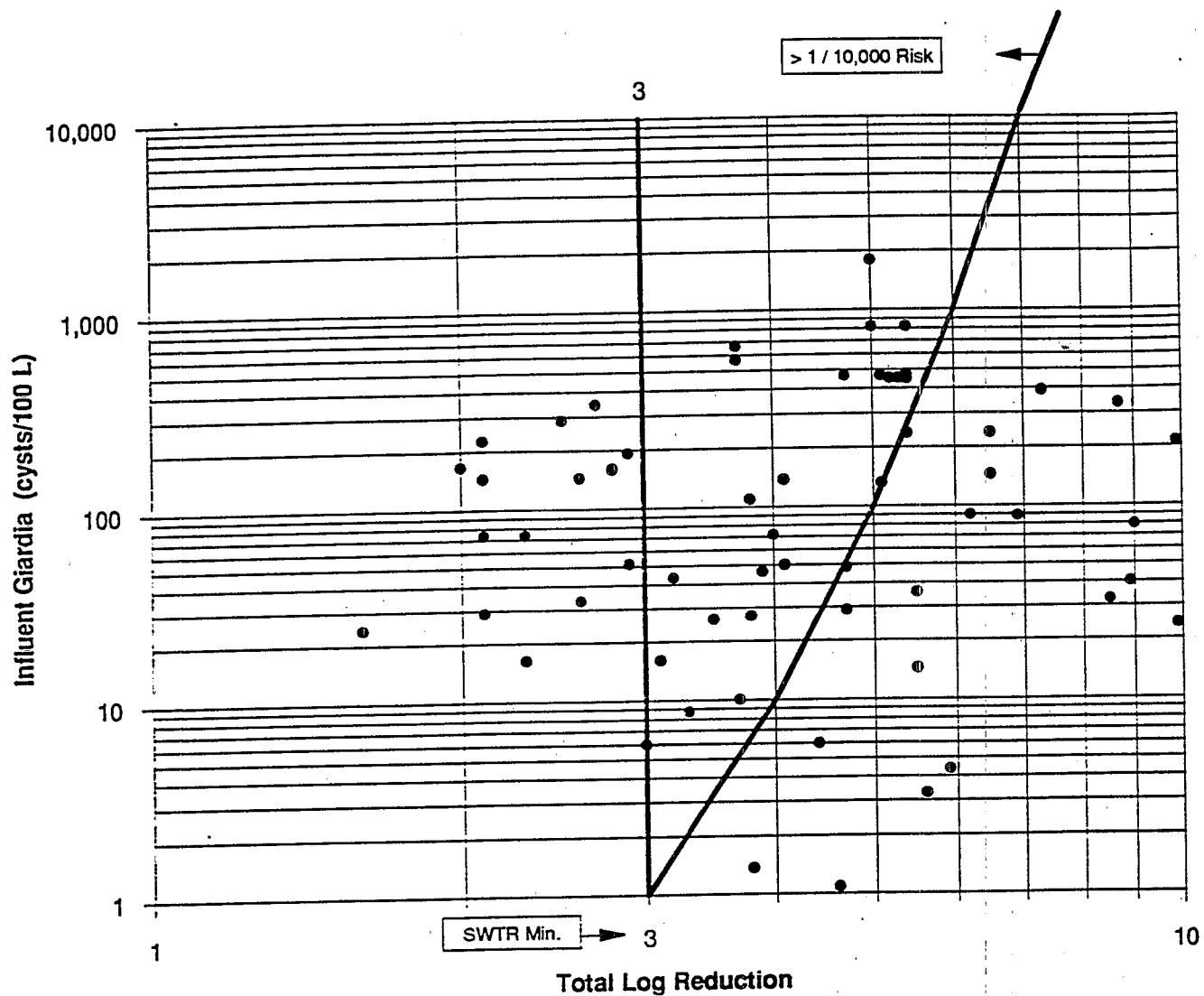
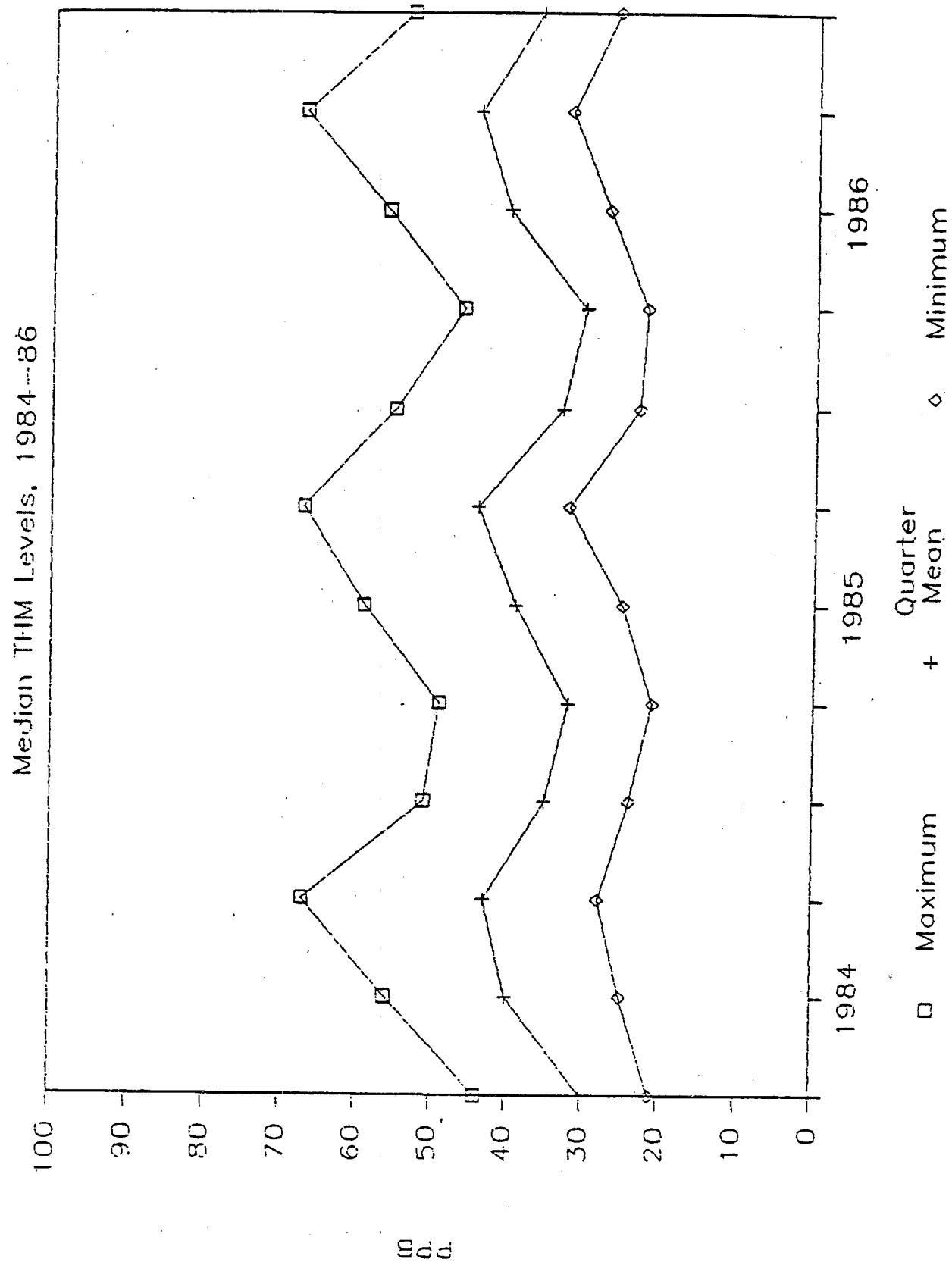


Exhibit 3



## Exhibit 4

**Disinfection By-Products Regulatory Analysis  
Baseline Cancer Incidence -- Based on Occurrence Data  
(Surface Water Systems)**

Annual Cases = Population Exposed (persons) x DBP Concentration ( $\mu\text{g/l}$ ) x Annual Risk Factor (cases/persons/year/ $\mu\text{g/l}$ )

	High Case Estimate <sup>1</sup>		Low Case Estimate <sup>2</sup>	
	<10,000 people	$\geq 10,000$ people	<10,000 people	$\geq 10,000$ people
<b>Total Population (million persons) <sup>3</sup></b>	17	145	17	145
<b>Average Concentrations (<math>\mu\text{g/l}</math>)</b>				
Chloroform	77.2	59.7		14
Bromodichloromethane	24.8	17.4		6.6
Dibromochloromethane	10.4	6.3		3.6
Bromoform	1.4	0.8		0.57
	114	84		25
TTHMs				
Dichloroacetic Acid	27.7	22.1		6.4
Tichloroacetic Acid	16.6	17.00		5.5
	44	39		12
THAAs				
<b>MLE Annual DW Risk Factors <sup>4</sup></b>				
Chloroform	1.43E-10	1.43E-10		1.43E-10
Bromodichloromethane	3.33E-10	3.33E-10		3.33E-10
Dibromochloromethane	3.33E-10	3.33E-10		3.33E-10
Bromoform	1.79E-10	1.79E-10		1.79E-10
Dichloroacetic Acid	3.59E-08	3.59E-08		3.59E-08
Tichloroacetic Acid	8.68E-09	8.68E-09		8.68E-09
<b>Cancer Incidence based on MLE (cases/yr.)</b>				
Chloroform	0.19	1.24		0.29
Bromodichloromethane	0.14	0.84		0.32
Dibromochloromethane	0.06	0.30		0.17
Bromoform	0.00	0.02		0.01
	0.4	2.4		0.8
TTHMs				
Dichloroacetic Acid	17.3	115.0		33.3
Tichloroacetic Acid	2.5	21.4		6.9
	20	136		40
THAAs				
<b>Total</b>				
<b>Upper 95% CI Annual DW Risk Factors <sup>5</sup></b>				
Chloroform	2.49E-09	2.49E-09		2.49E-09
Bromodichloromethane	1.02E-08	1.02E-08		1.02E-08
Dibromochloromethane	1.02E-08	1.02E-08		1.02E-08
Bromoform	3.22E-09	3.22E-09		3.22E-09
Dichloroacetic Acid	1.13E-07	1.13E-07		1.13E-07
Tichloroacetic Acid	2.57E-08	2.57E-08		2.57E-08
<b>Cancer Incidence Based on 95% CI (cases/yr.)</b>				
Chloroform	3.3	21.6		5.1
Bromodichloromethane	4.4	25.7		9.8
Dibromochloromethane	1.8	9.3		5.3
Bromoform	0.1	0.4		0.3
	10	57		20
TTHMs				
Dichloroacetic Acid	54.3	361.0		104.5
Tichloroacetic Acid	7.4	63.4		20.5
	62	424		125
THAAs				
<b>Total</b>				

<sup>1</sup> Based on occurrence data from: disinfection by-products field studies data (EPA,OGWDW,TSD)

<sup>2</sup> Based on occurrence data from Krasner et al., 1989

<sup>3</sup> Source: Federal Reporting Data System (FRDS)

<sup>4</sup> maximum likelihood estimate (MLE)

<sup>5</sup> upper 95% confidence interval

# Population Served By Community Water Systems

(Total = 242 million)

**Large Systems (serving >10,000)**

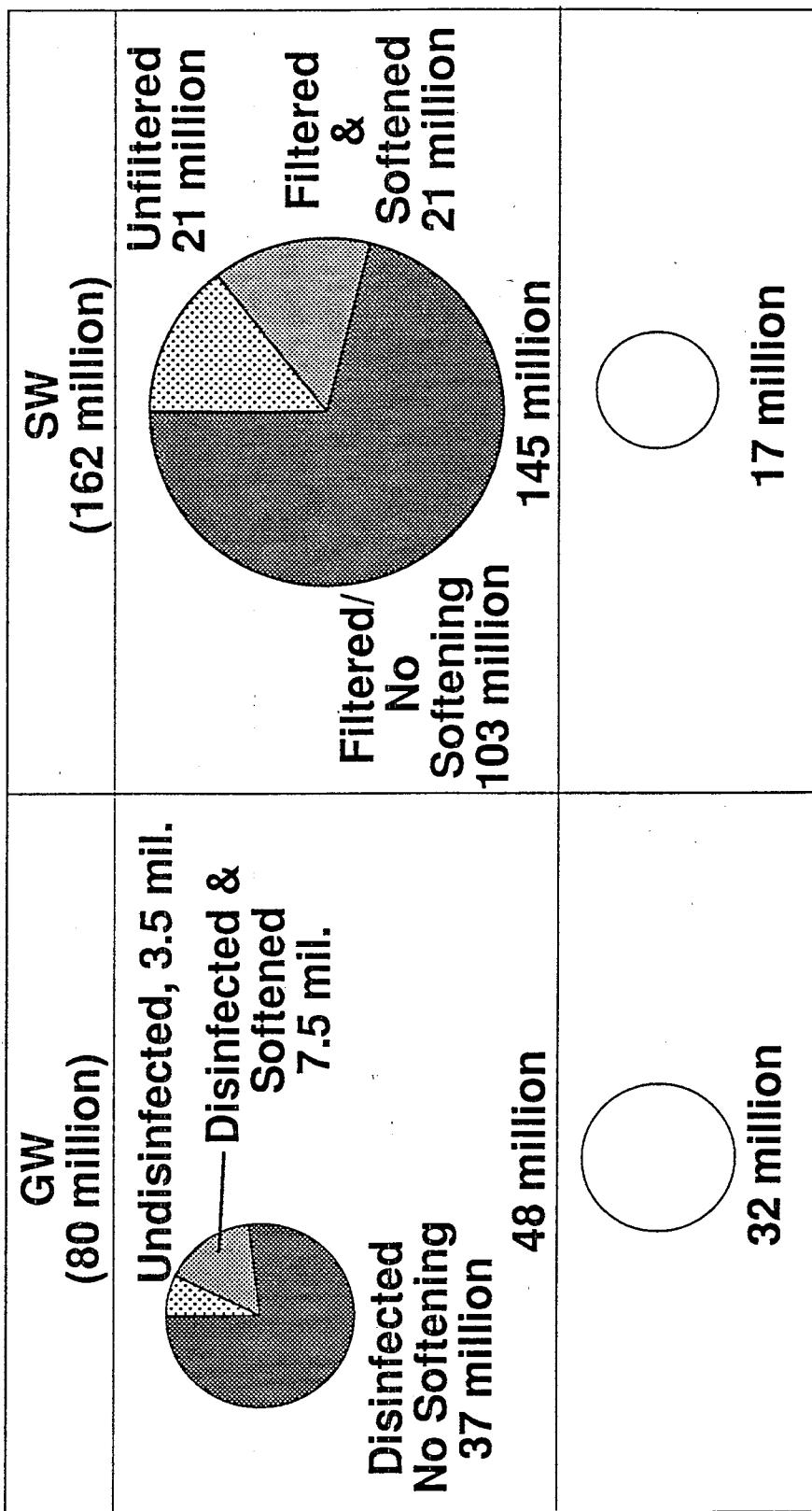


Exhibit 5

# Major Steps in DBP Analysis

- 
- ```
graph TD; 1[1. Model raw water variability] --> 2[2. Model compliance choices in process control & treatment]; 2 --> 3[3. Predict treatment performance and resulting exposures]; 3 --> 4[4. Predict microbial & cancer risks]; 4 --> 5[5. Present cancer & giardia risk models]; 5 --> 6[WTP model: DBP equations & CXT equations]; 6 --> 7[Monte Carlo simulation]; 5 -- "Analytical Tools" --> 4;
```
1. Model raw water variability
  2. Model compliance choices in process control & treatment
  3. Predict treatment performance and resulting exposures.
  4. Predict microbial & cancer risks
  - Present cancer & giardia risk models
  - WTP model:  
DBP equations &  
CXT equations
  - Monte Carlo simulation

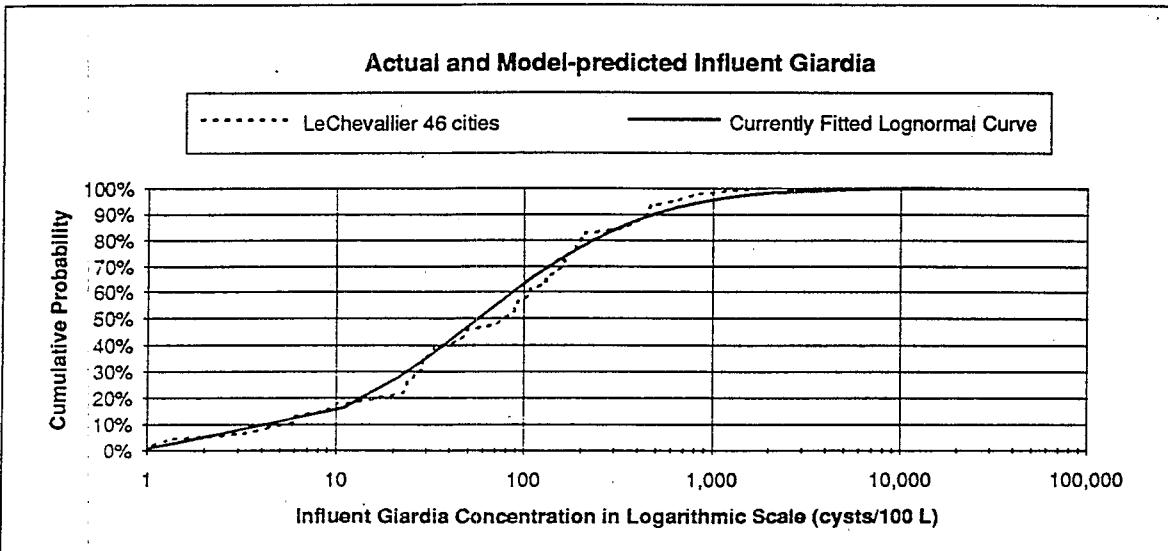
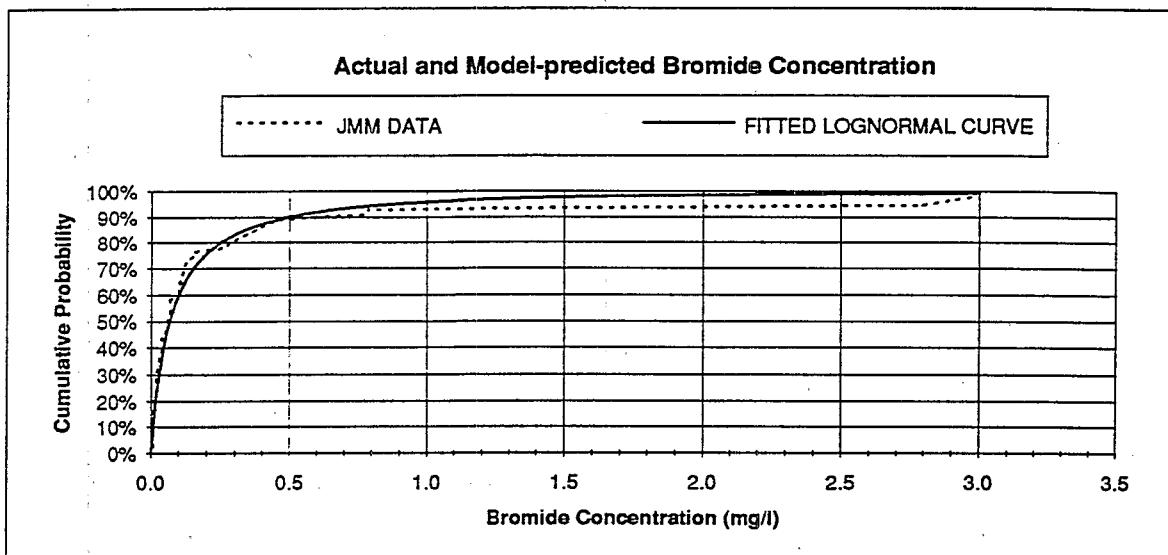
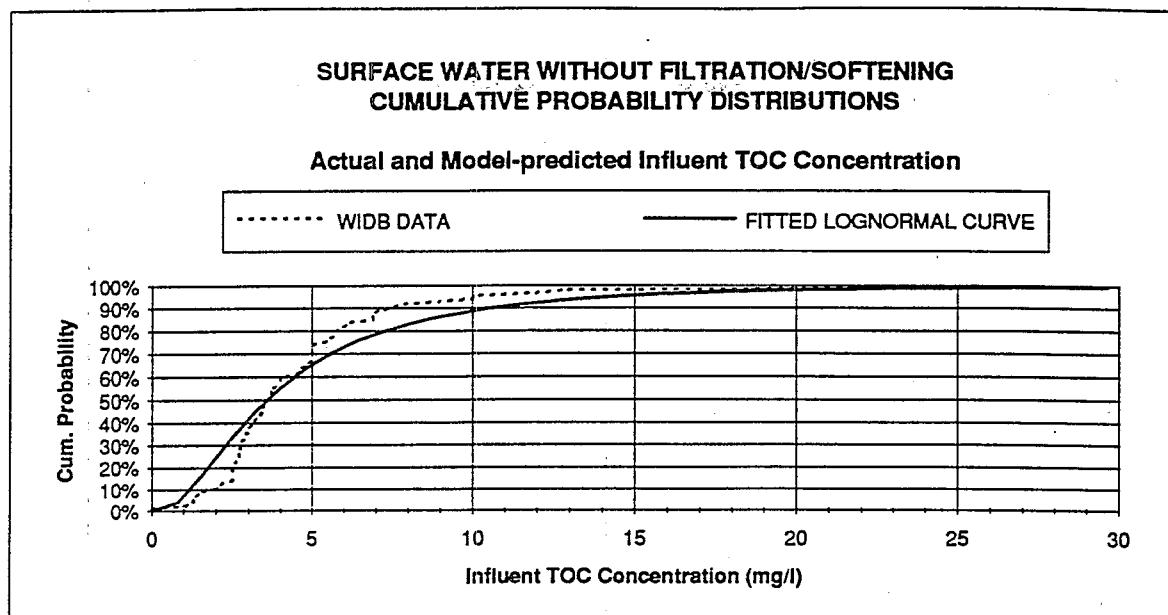
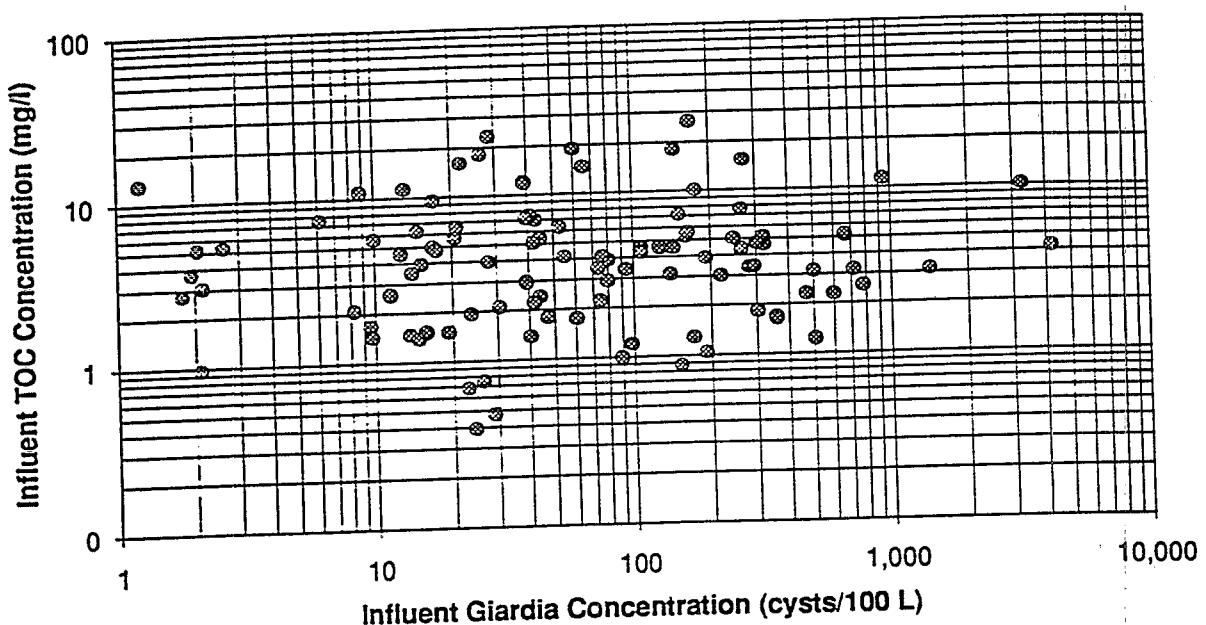
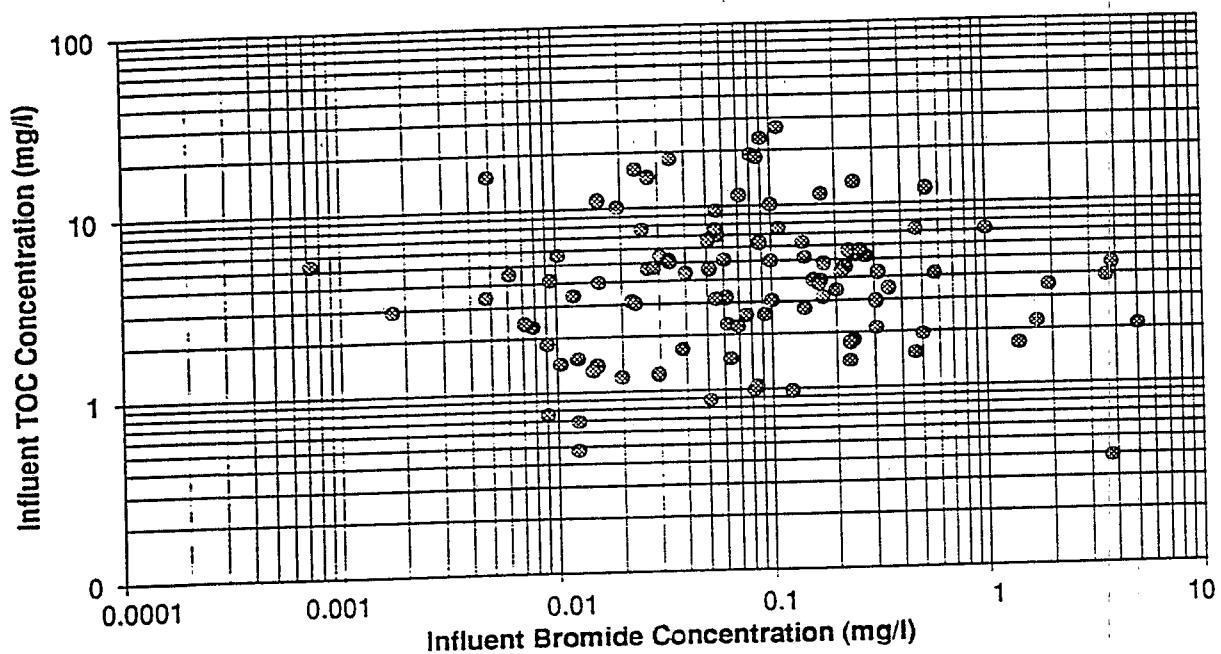


Exhibit 8

Simulated Influent TOC vs. Influent Giardia



Simulated Influent TOC vs. Influent Bromide



# Compliance Decision Tree

Exhibit 9

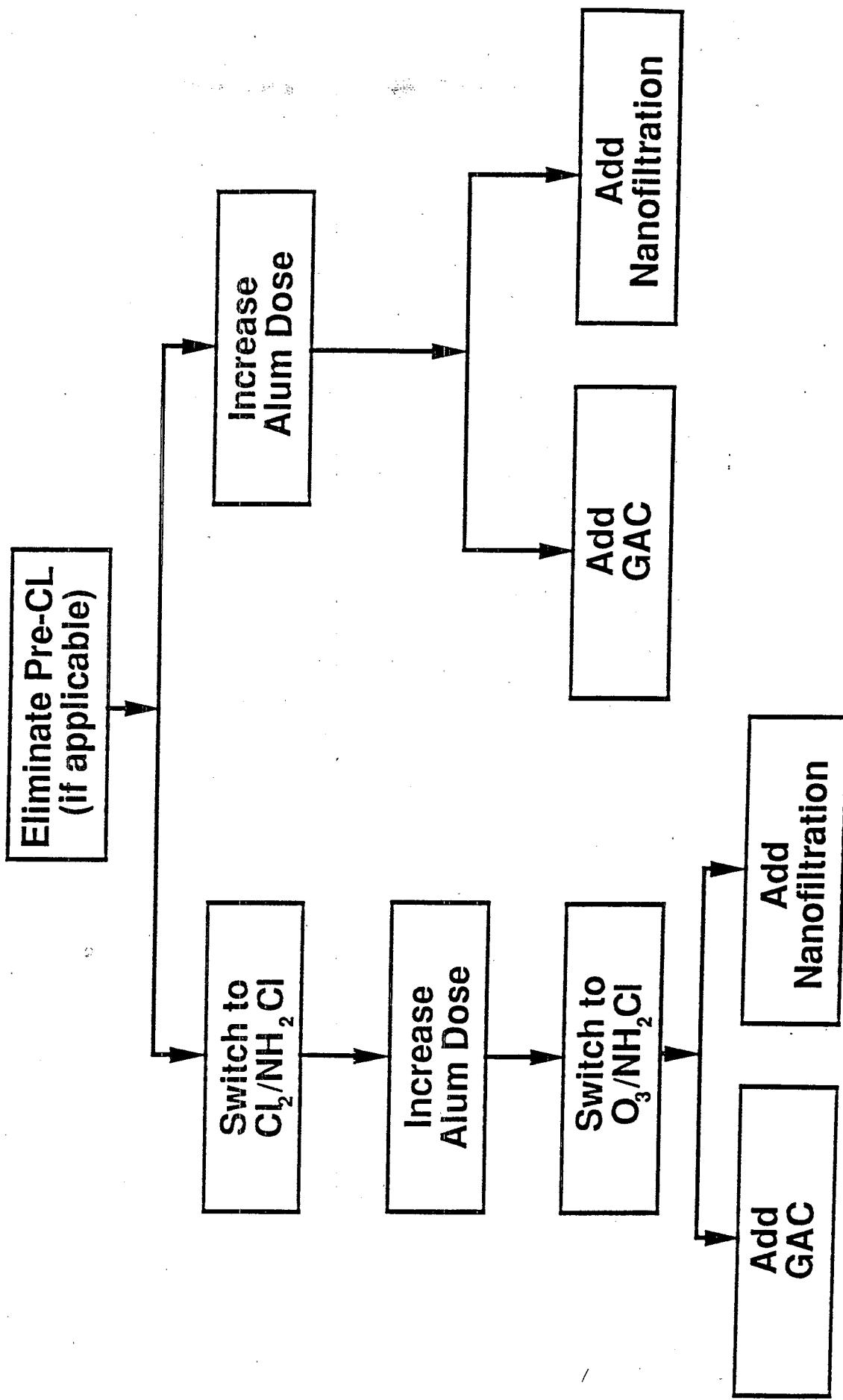


Exhibit 10

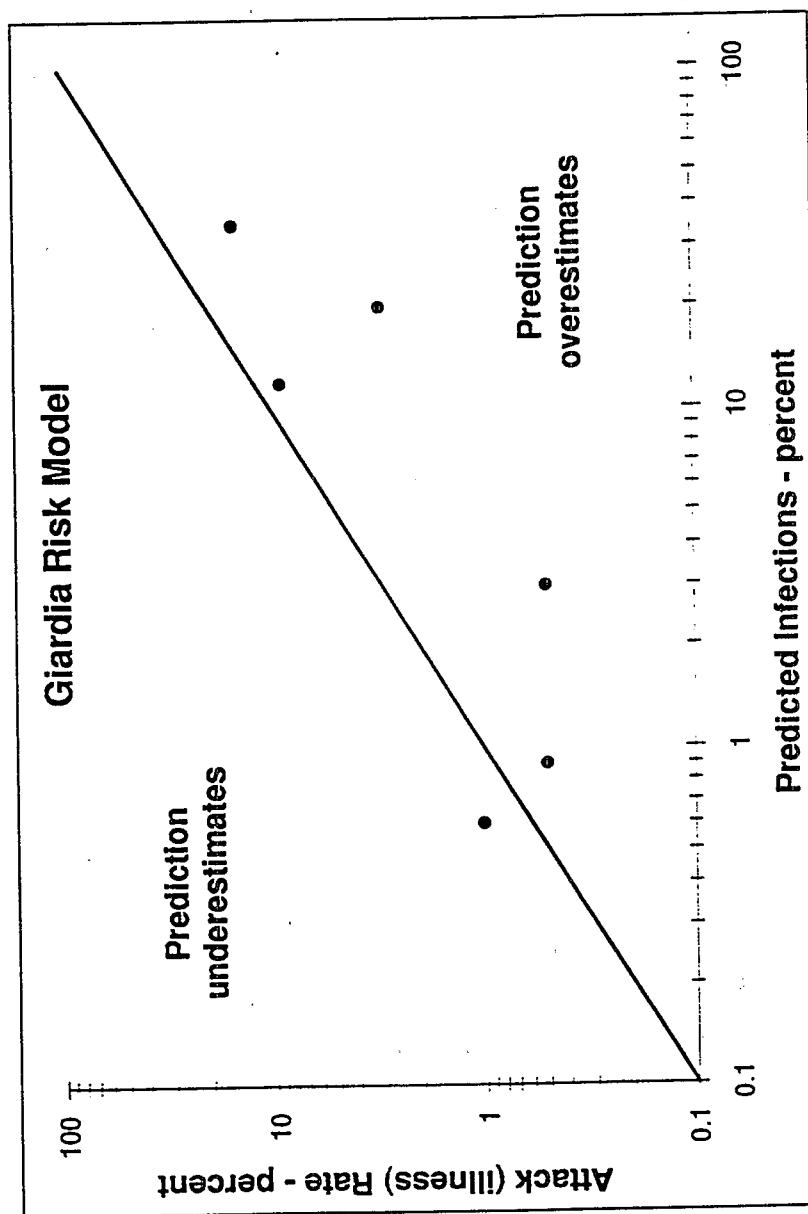


Exhibit 11

Overview of *Giardia* Modelling

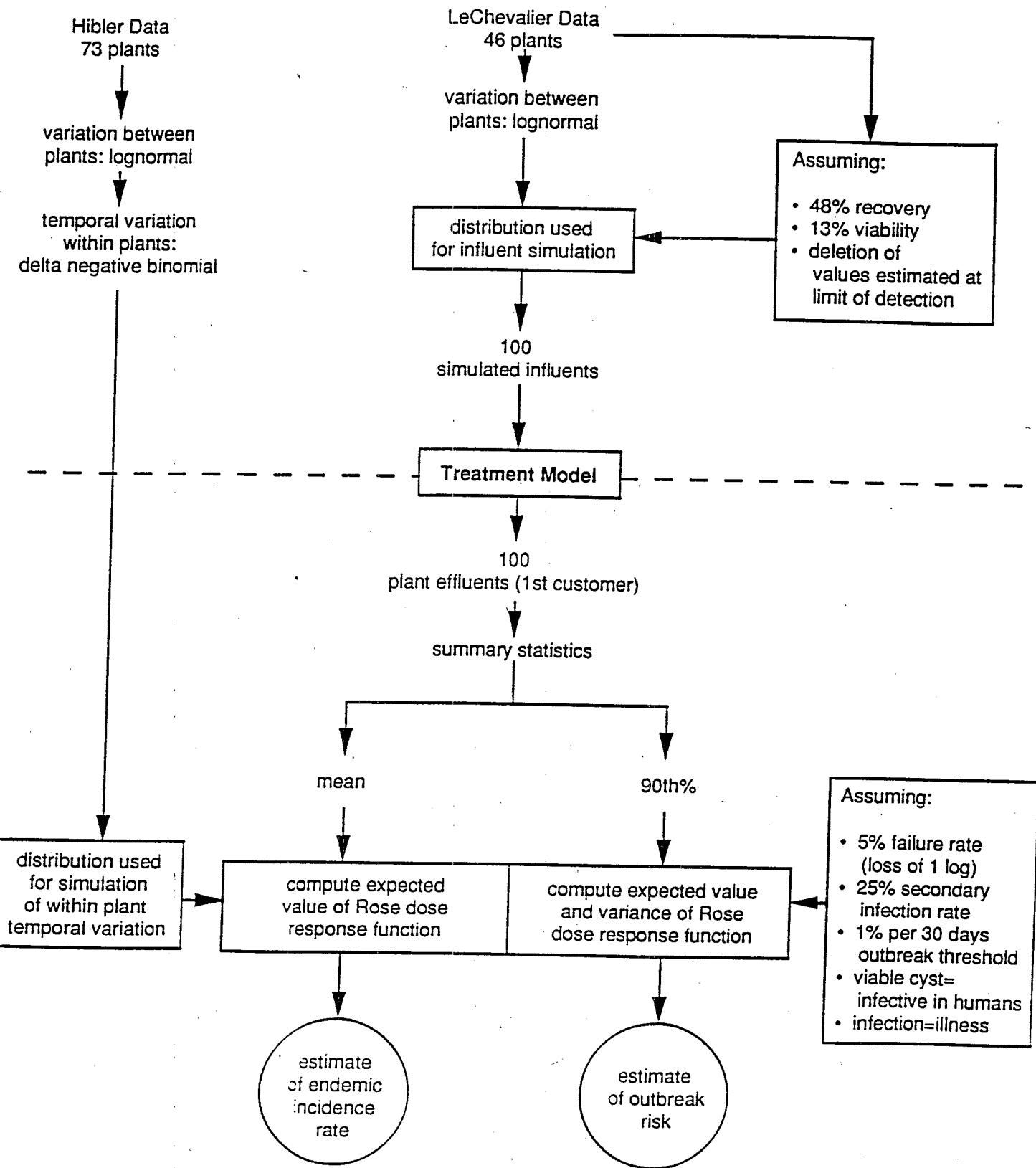


Exhibit 12

Overview of National-Level Model

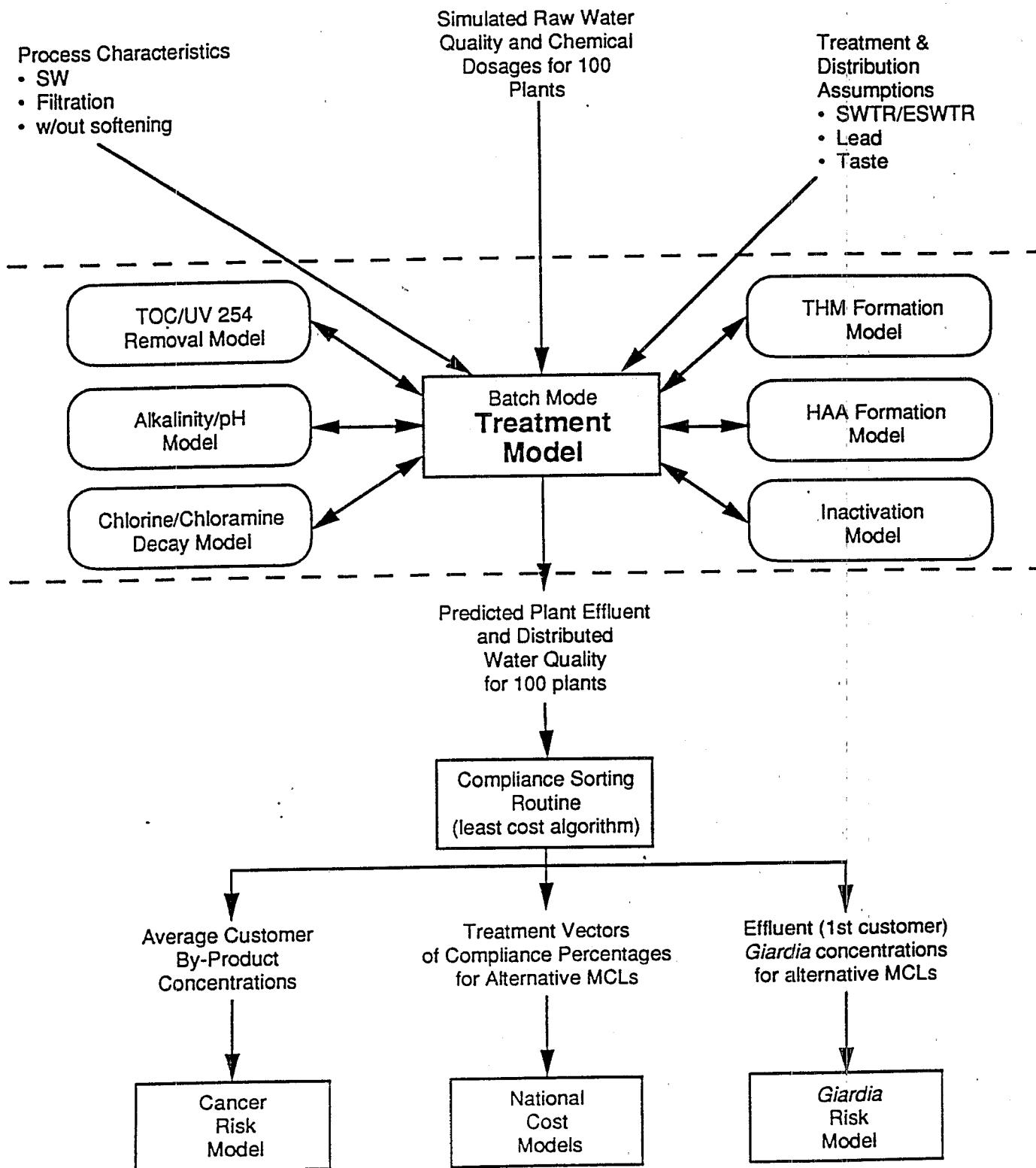
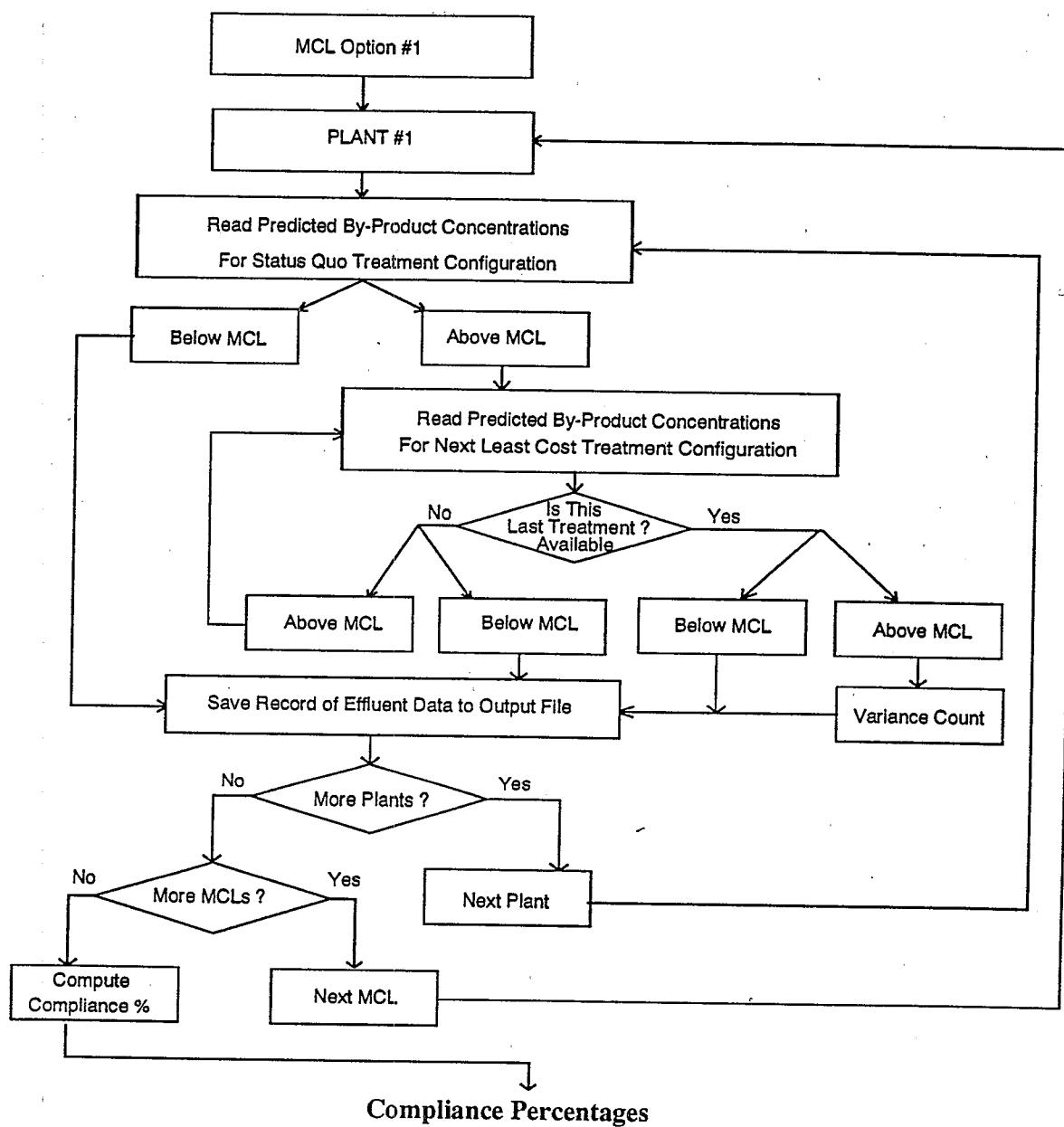


Exhibit 13  
Compliance Sorting Routine



| SWTR Scenario<br>W/ Alt. Disinf.         | TTHM MCLs (ug/l) |    |    |    |
|------------------------------------------|------------------|----|----|----|
|                                          | 100              | 75 | 50 | 25 |
| No further treatment                     | 61               | 49 | 33 | 17 |
| Eliminate per-chlorination               | 21               | 25 | 23 | 10 |
| Eliminate per-chlor & add ammonia        | 18               | 23 | 34 | 30 |
| pre-chlor + ammonia + alum dose          | 0                | 3  | 9  | 27 |
| pre-chlor + ammonia + alum + ozone       | 0                | 0  | 1  | 13 |
| pre-chlor + ammonia + alum + ozone + GAC | 0                | 0  | 0  | 3  |

Exhibit 14

The Core Problem

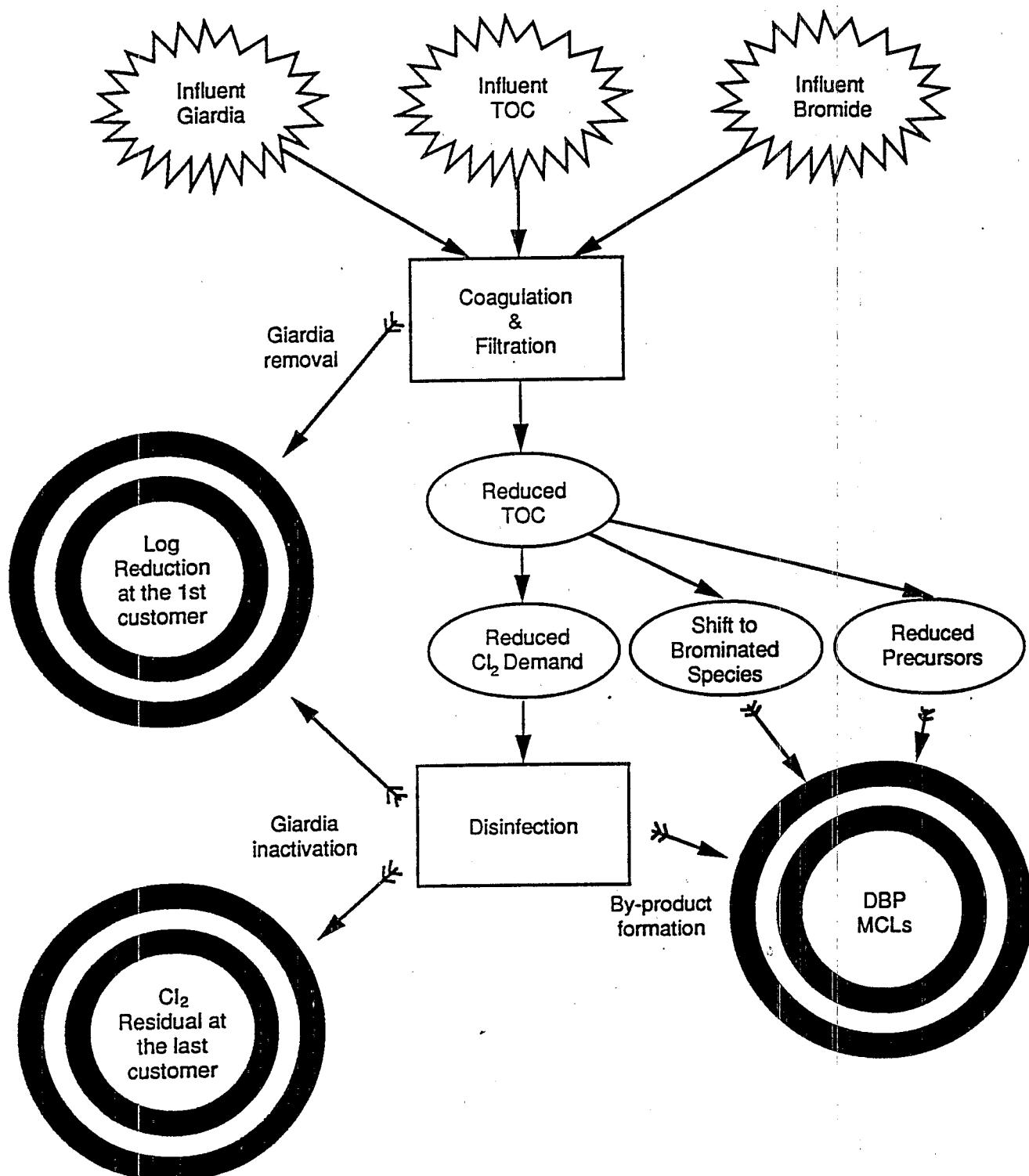


Exhibit 15

**SWTR Scenario: With Alternate Disinfectants**  
**TTHM MCL= 100 (ug/l)      #. of Plants = 39**

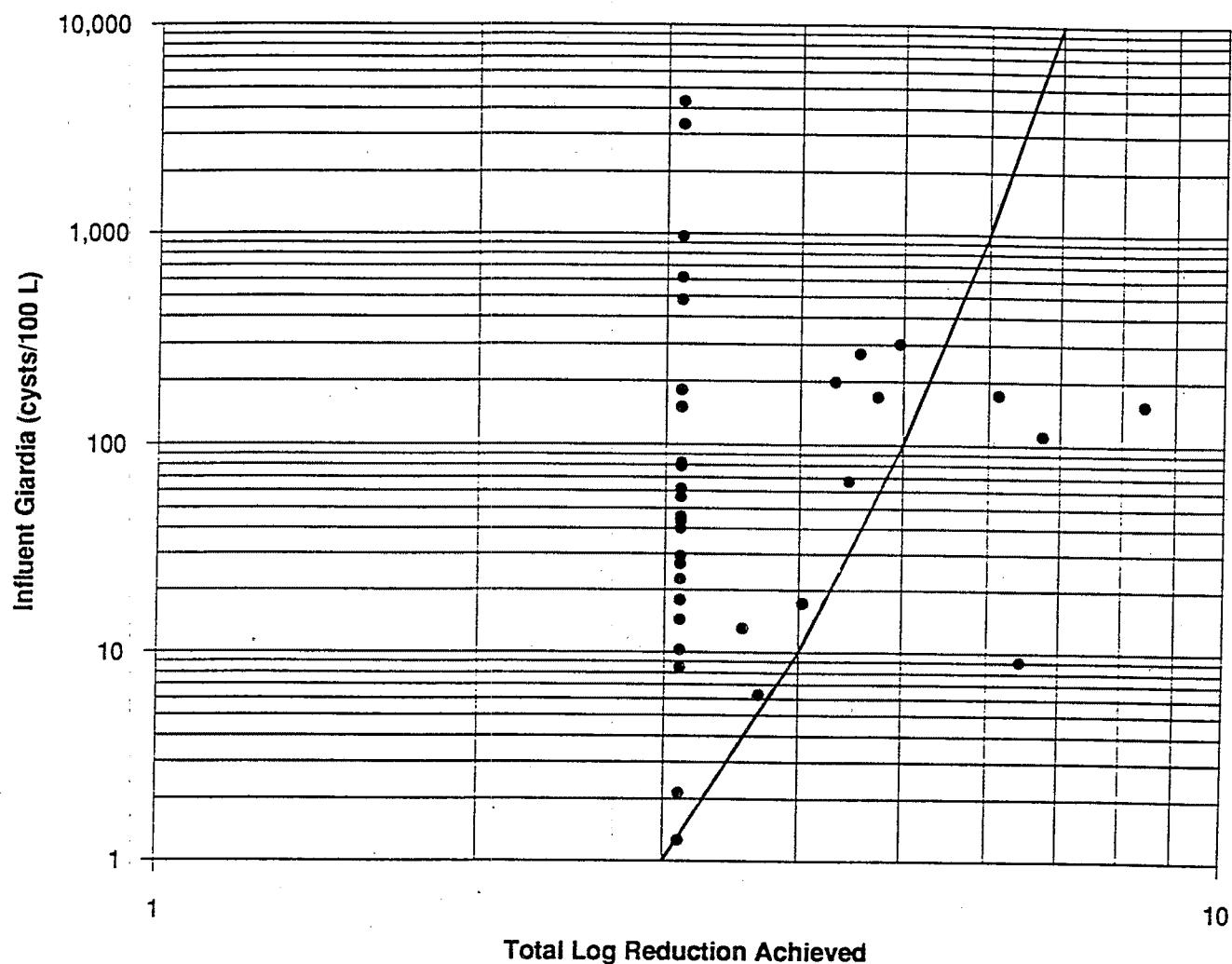


Exhibit 16

**SWTR Scenario: With Alternate Disinfectants**

**TTHM MCL = 25 (ug/l)      #. of Plants Treating = 83**

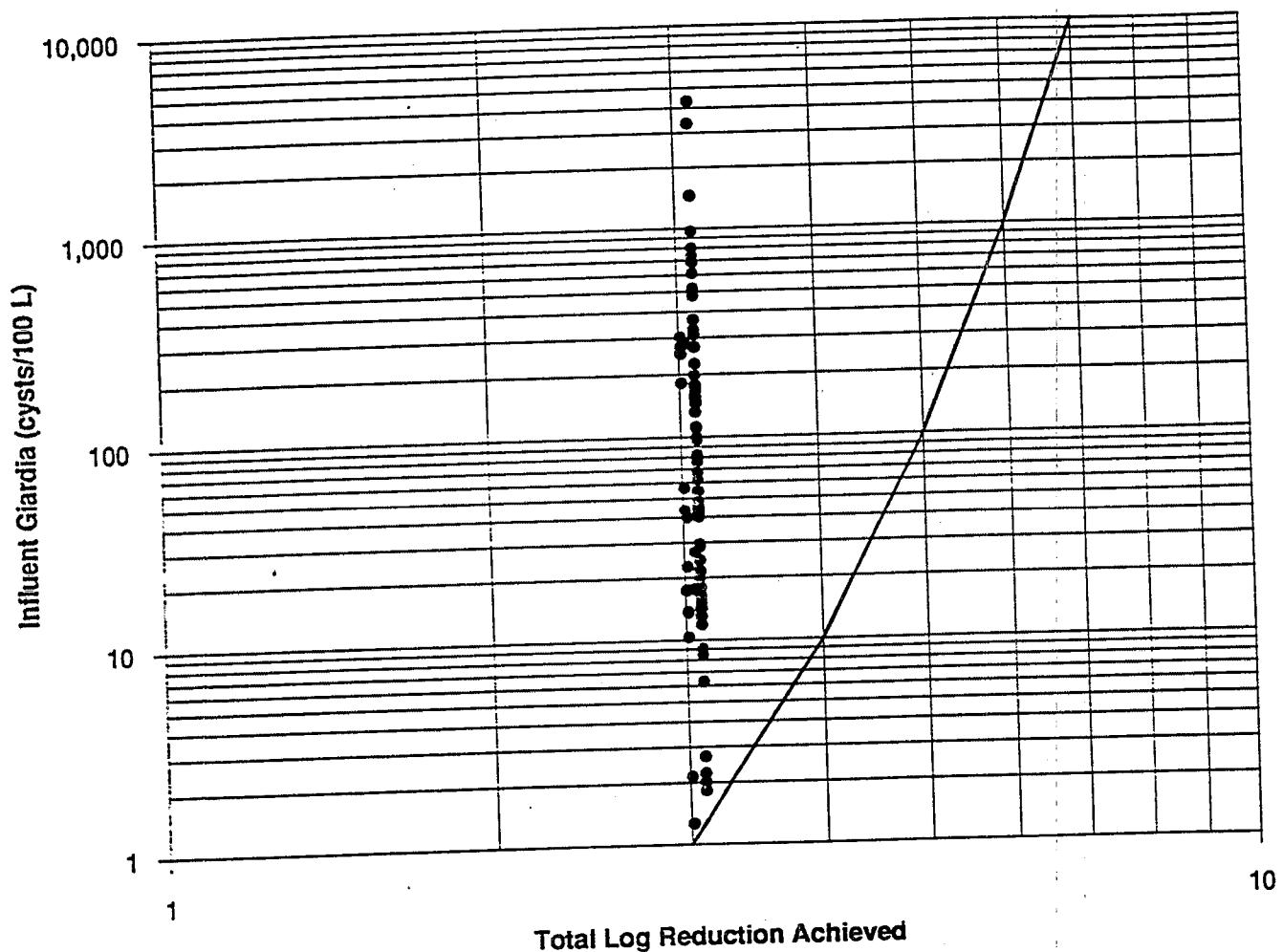


Exhibit 17

**SWTR Scenario: With Alternate Disinfectants**  
**TTHM MCL = 100 ug/l to 75 ug/l**

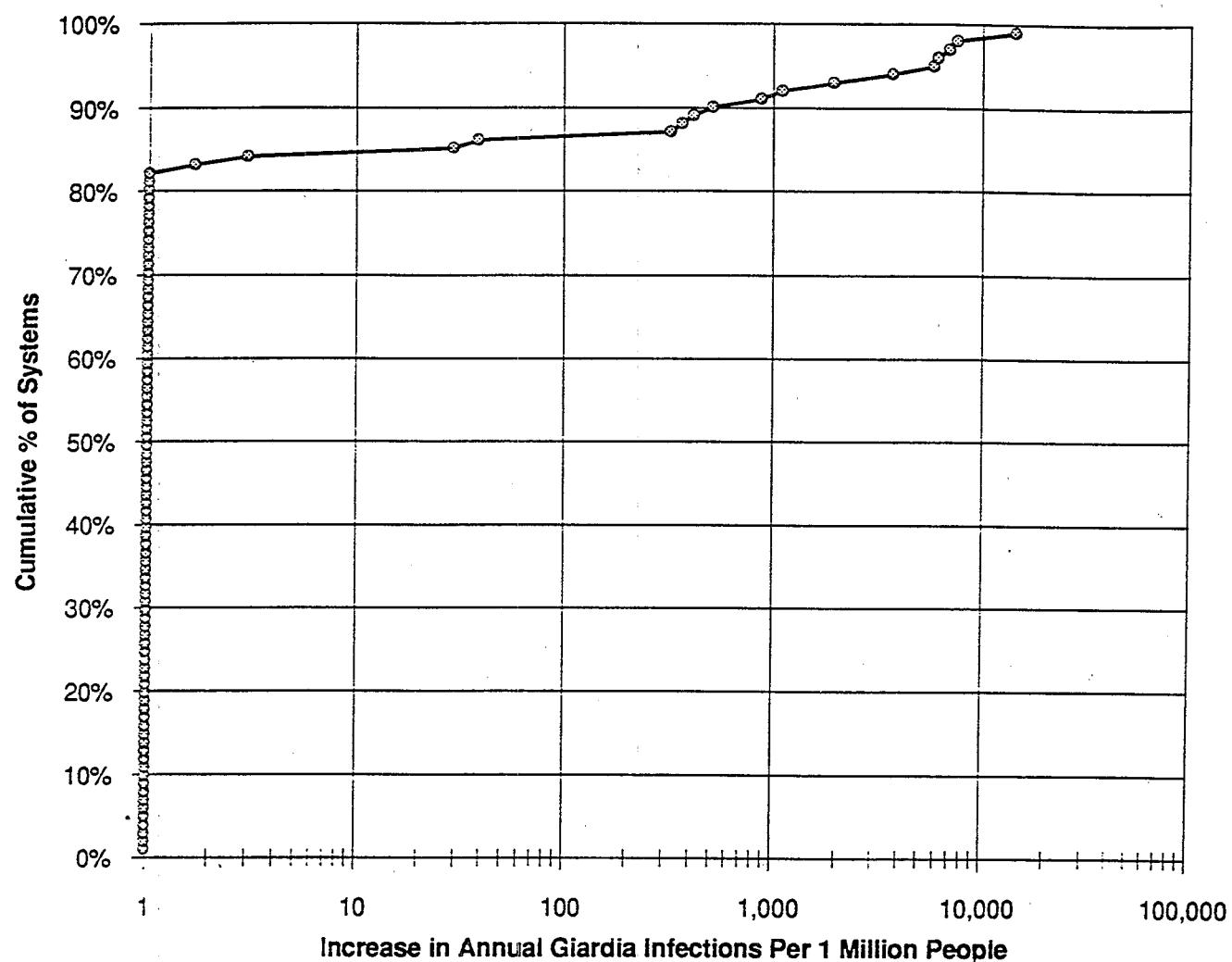


Exhibit 18

**SWTR Scenario: With Alternate Disinfectants**  
**TTHM MCL = 100 ug/l to 25 ug/l**

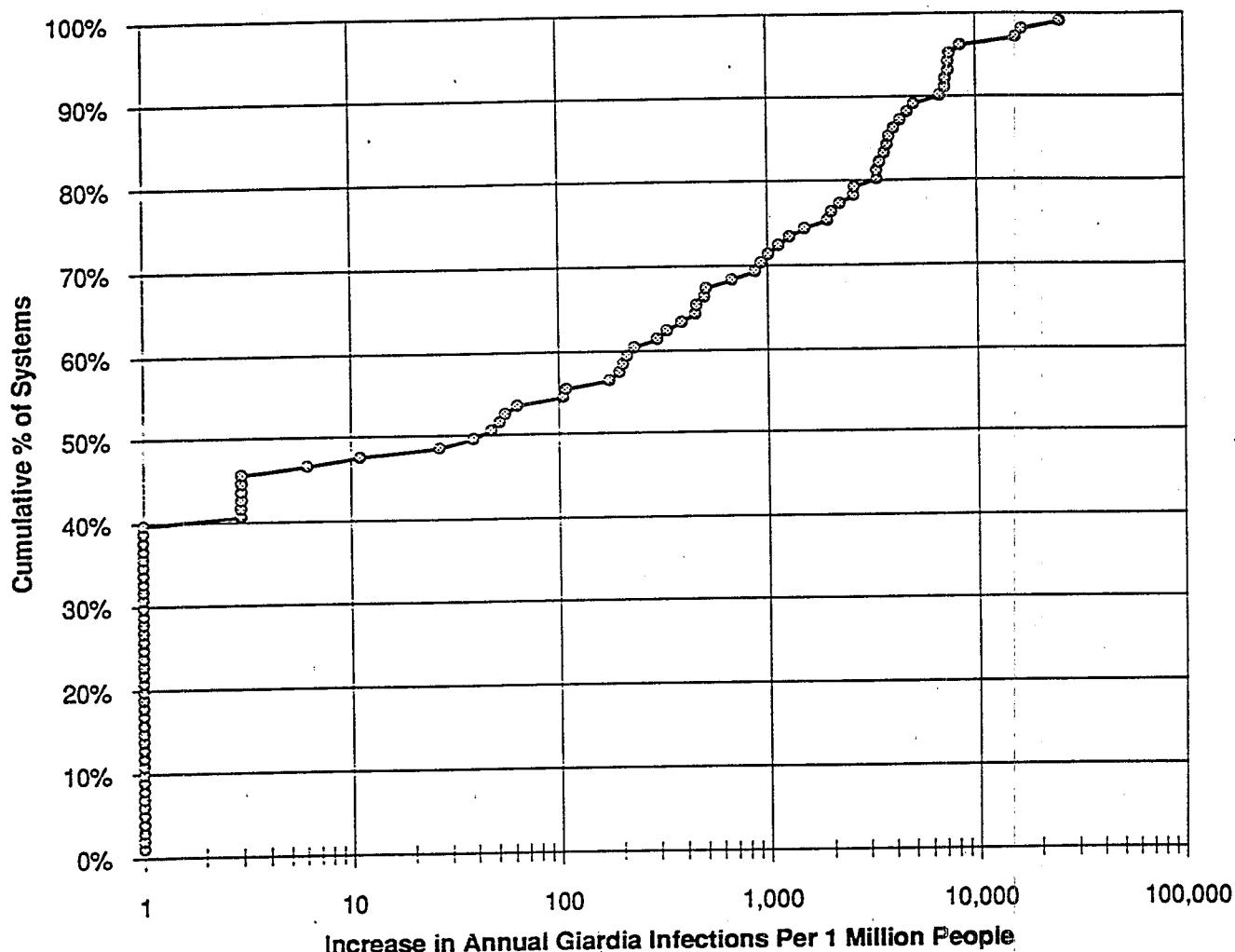


Exhibit 19

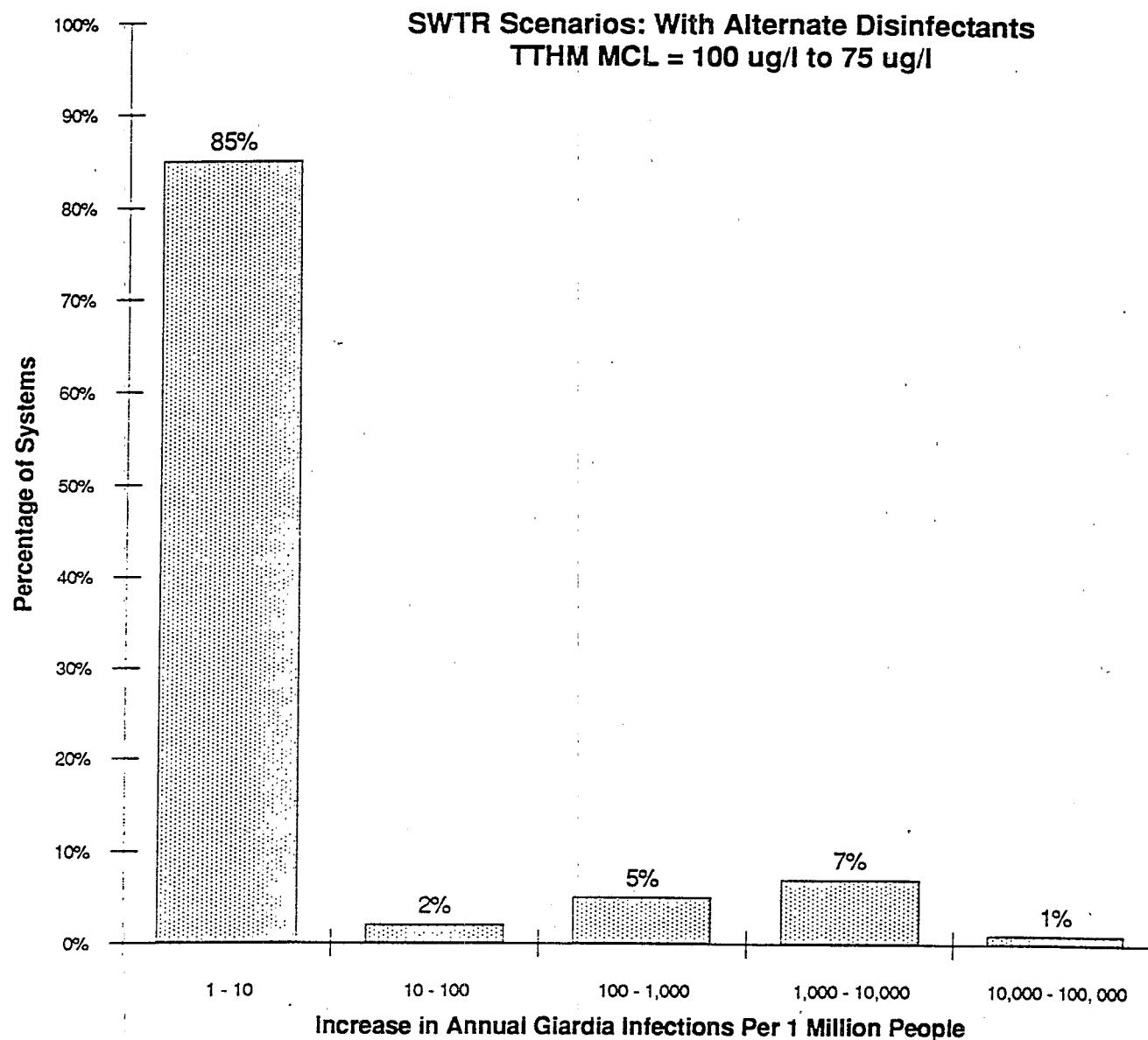


Exhibit 20

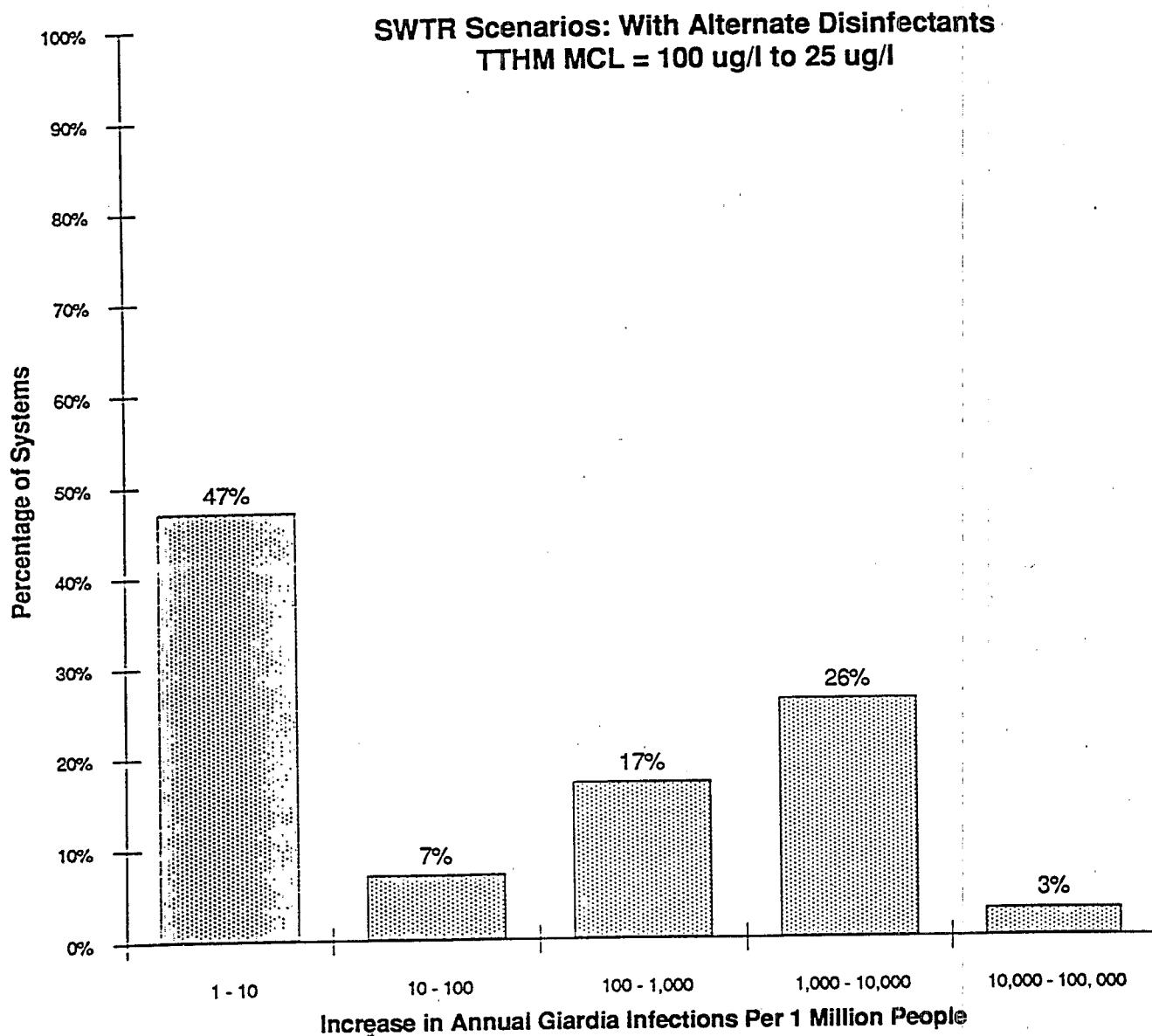


Exhibit 21

**SWTR Scenario: With Alternate Disinfectants**

**From TTHM MCL = 100 ug/l to 75 ug/l  
Change in Risks Per 1 Million People**

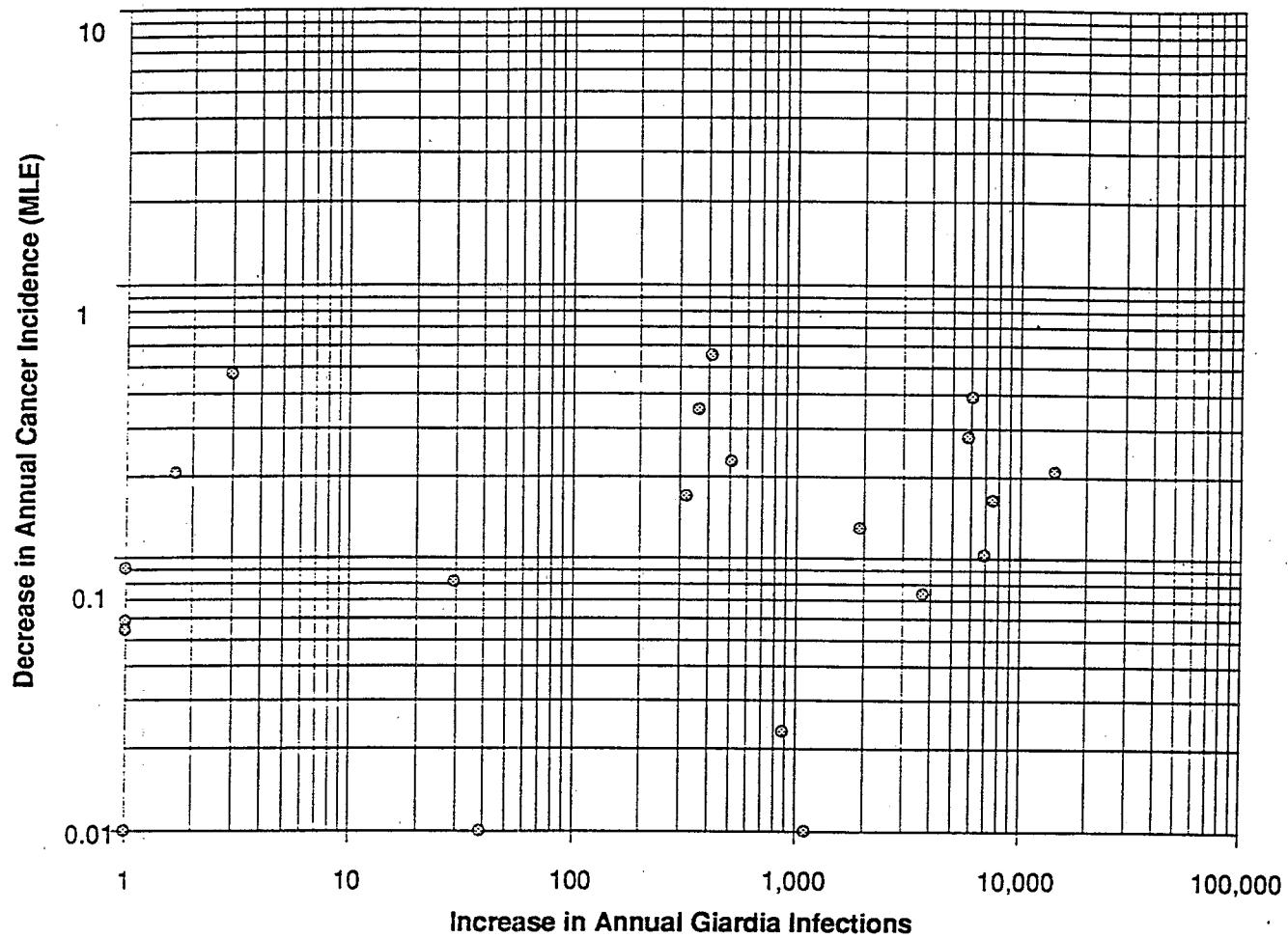


Exhibit 22

**SWTR Scenario: With Alternate Disinfectants**

**From TTHM MCL = 100 ug/l to 25 ug/l  
Change in Risks Per 1 Million People**

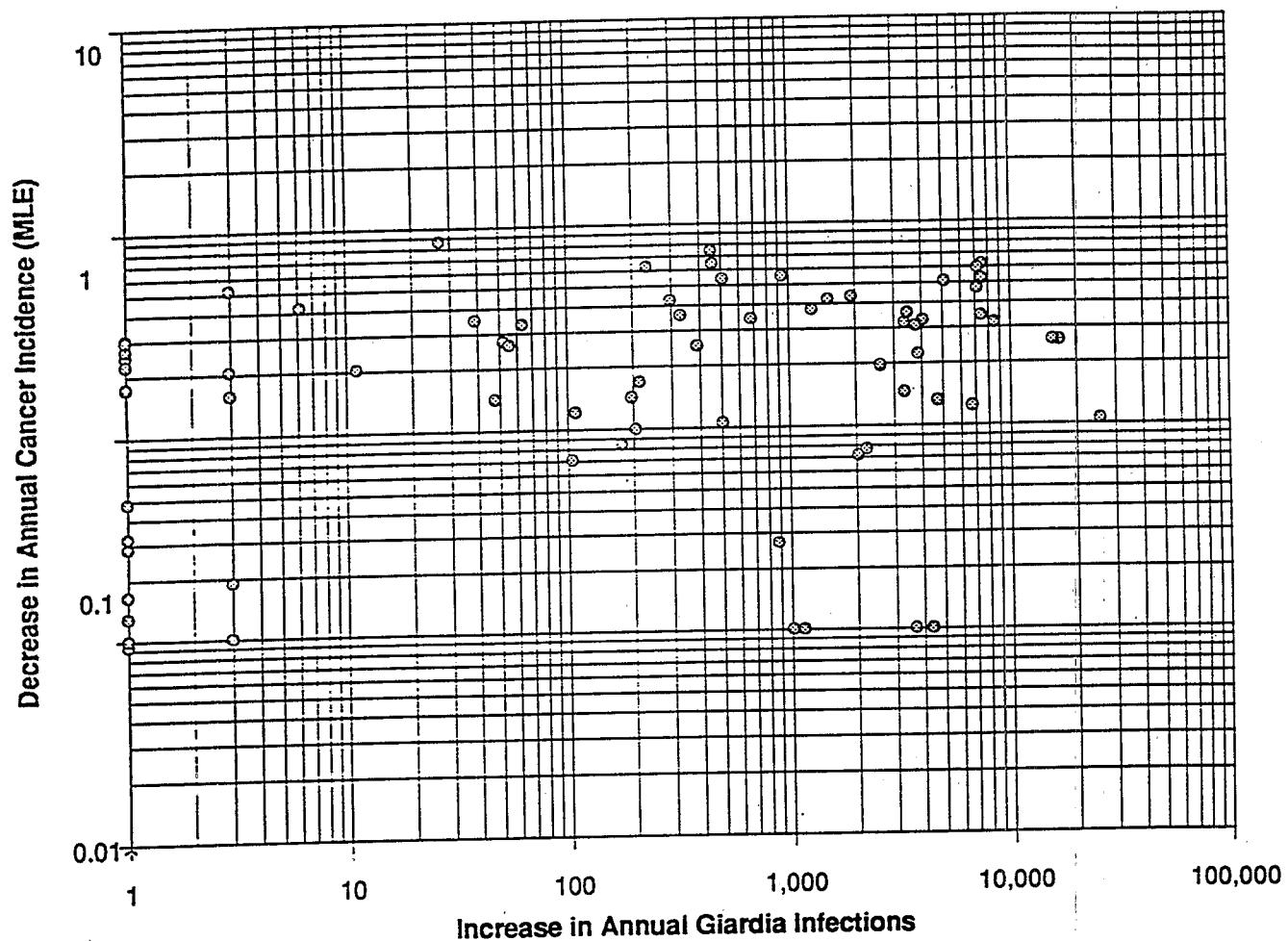


Exhibit 23

**SWTR Scenario: With Alternate Disinfectants**  
**THAA MCL = 60 (ug/l)      #. of Plants = 29**

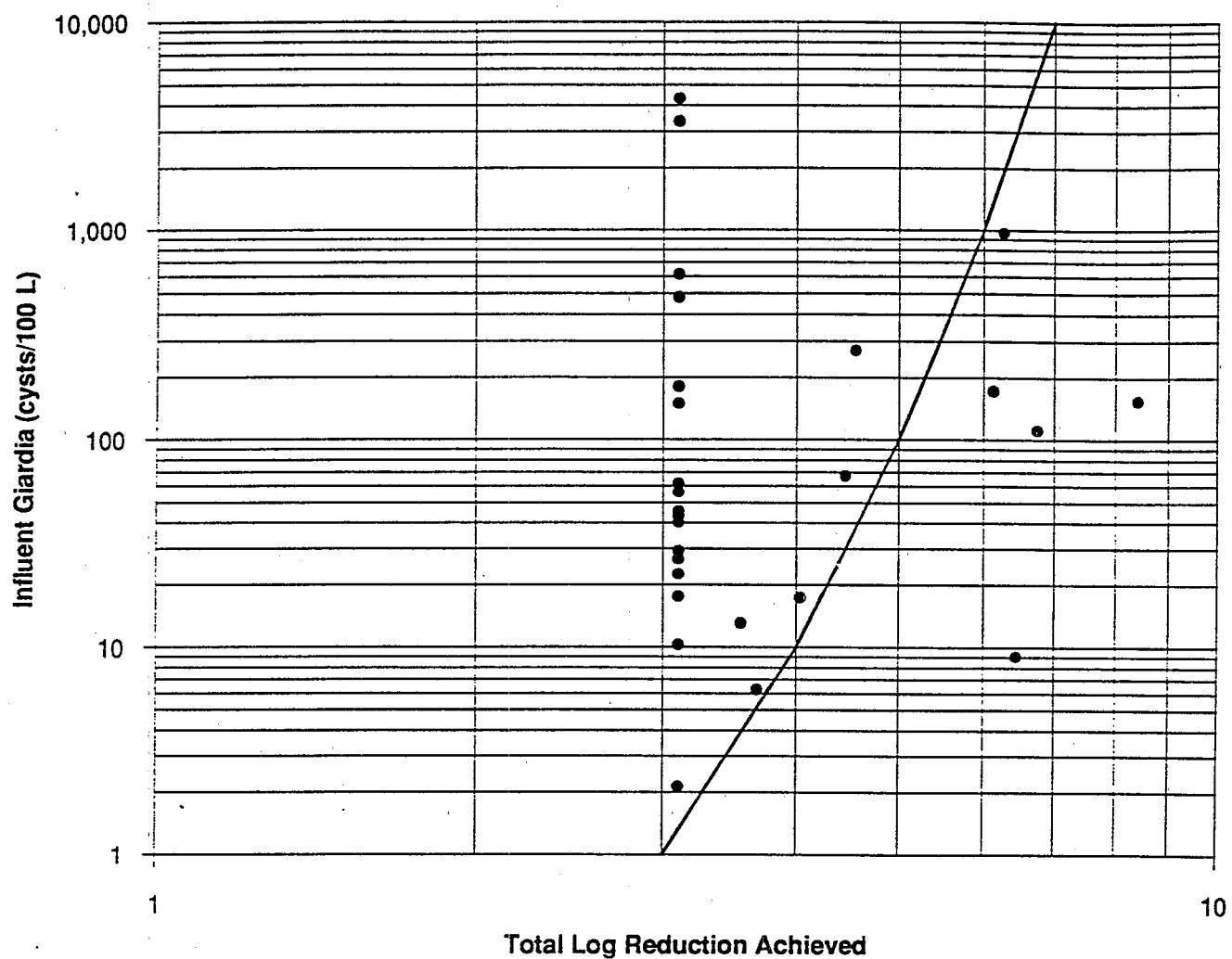


Exhibit 24

SWTR Scenario: With Alternate Disinfectants

THAA MCL = 10 (ug/l)      #. of Plants Treating = 80

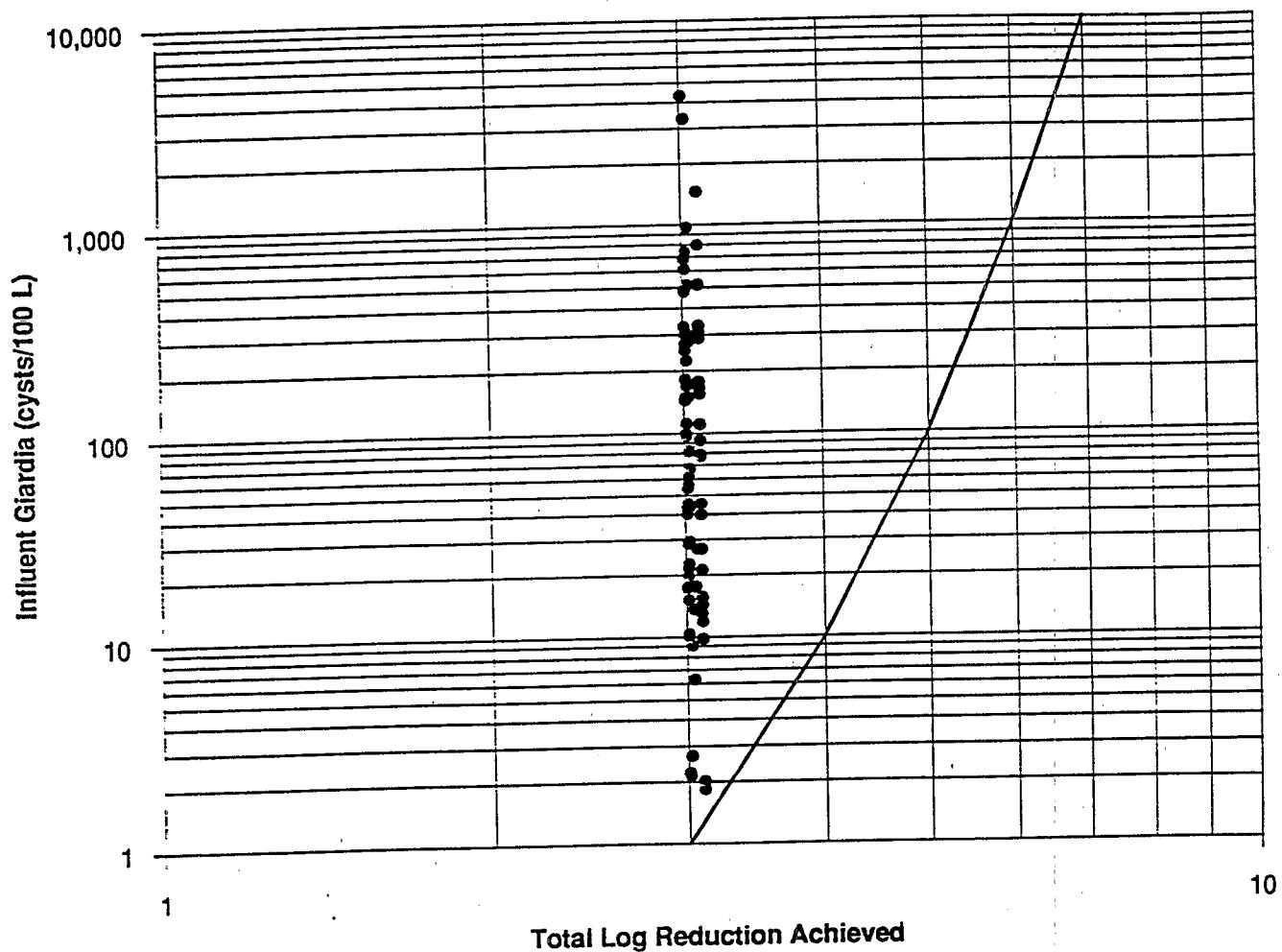


Exhibit 25

**SWTR Scenario: With Alternate Disinfectants**  
**THAA MCL = 60 ug/l to 50 ug/l**

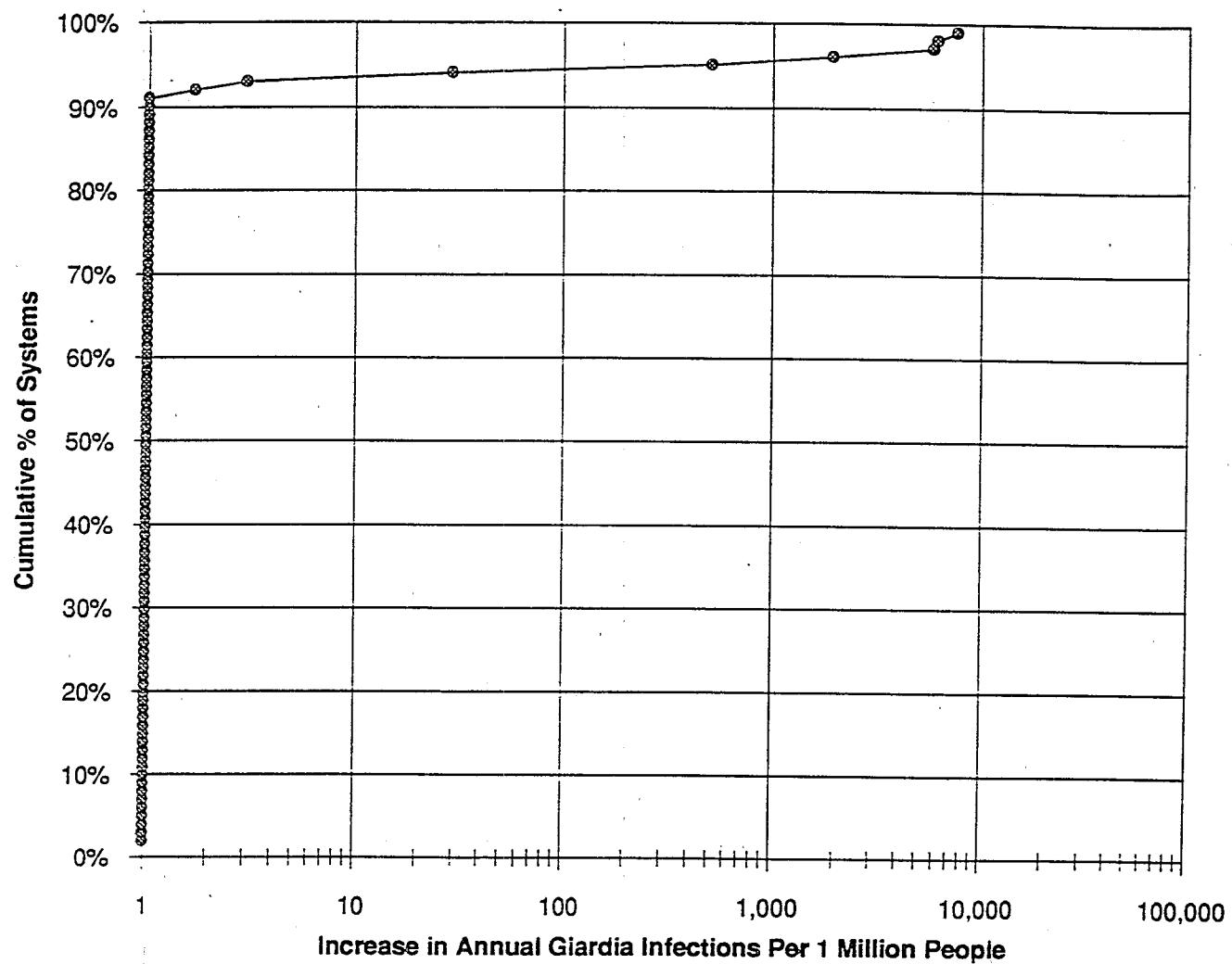


Exhibit 26

**SWTR Scenario: With Alternate Disinfectants**  
**THAA MCL = 60 ug/l to 10 ug/l**

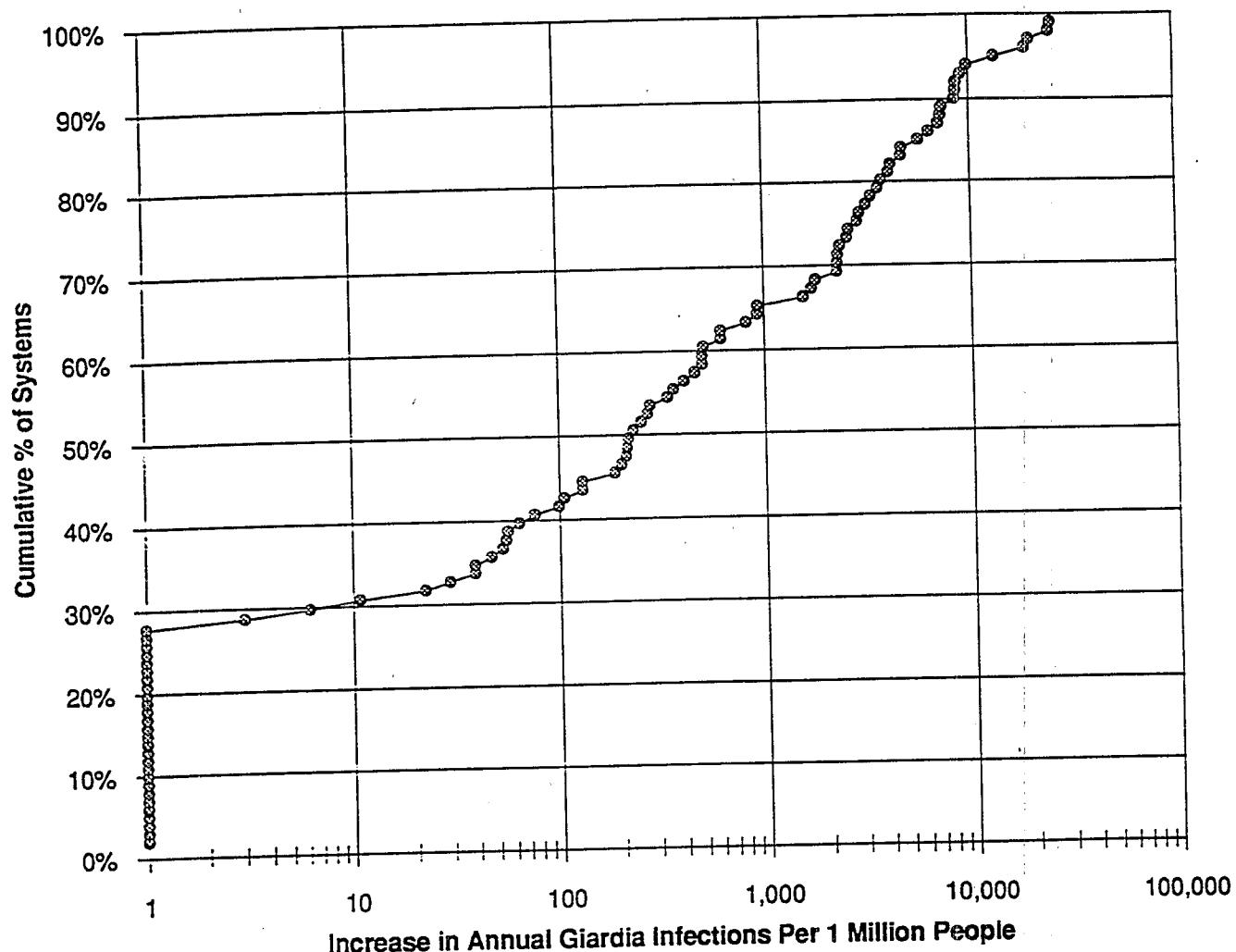


Exhibit 27

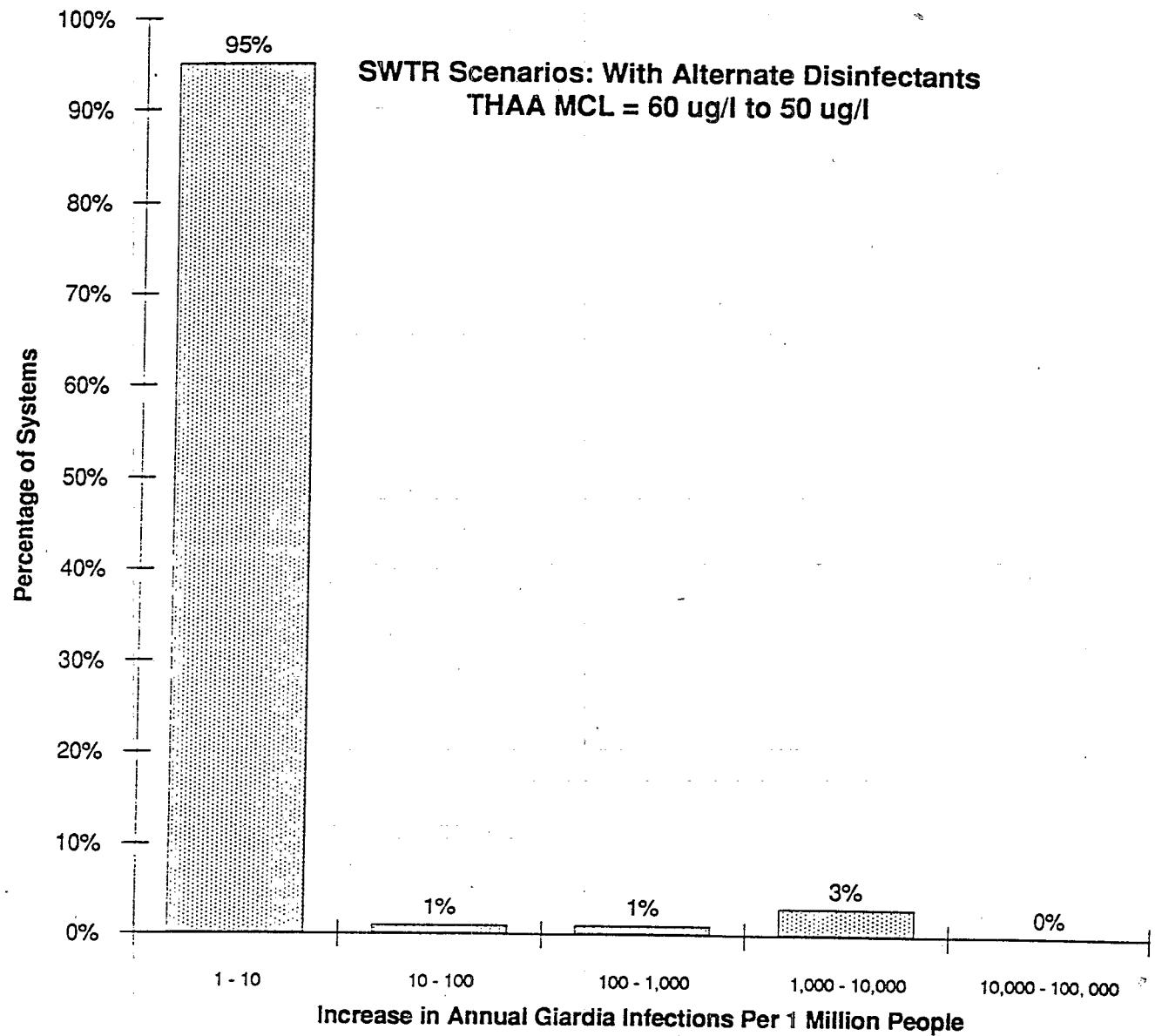


Exhibit 28

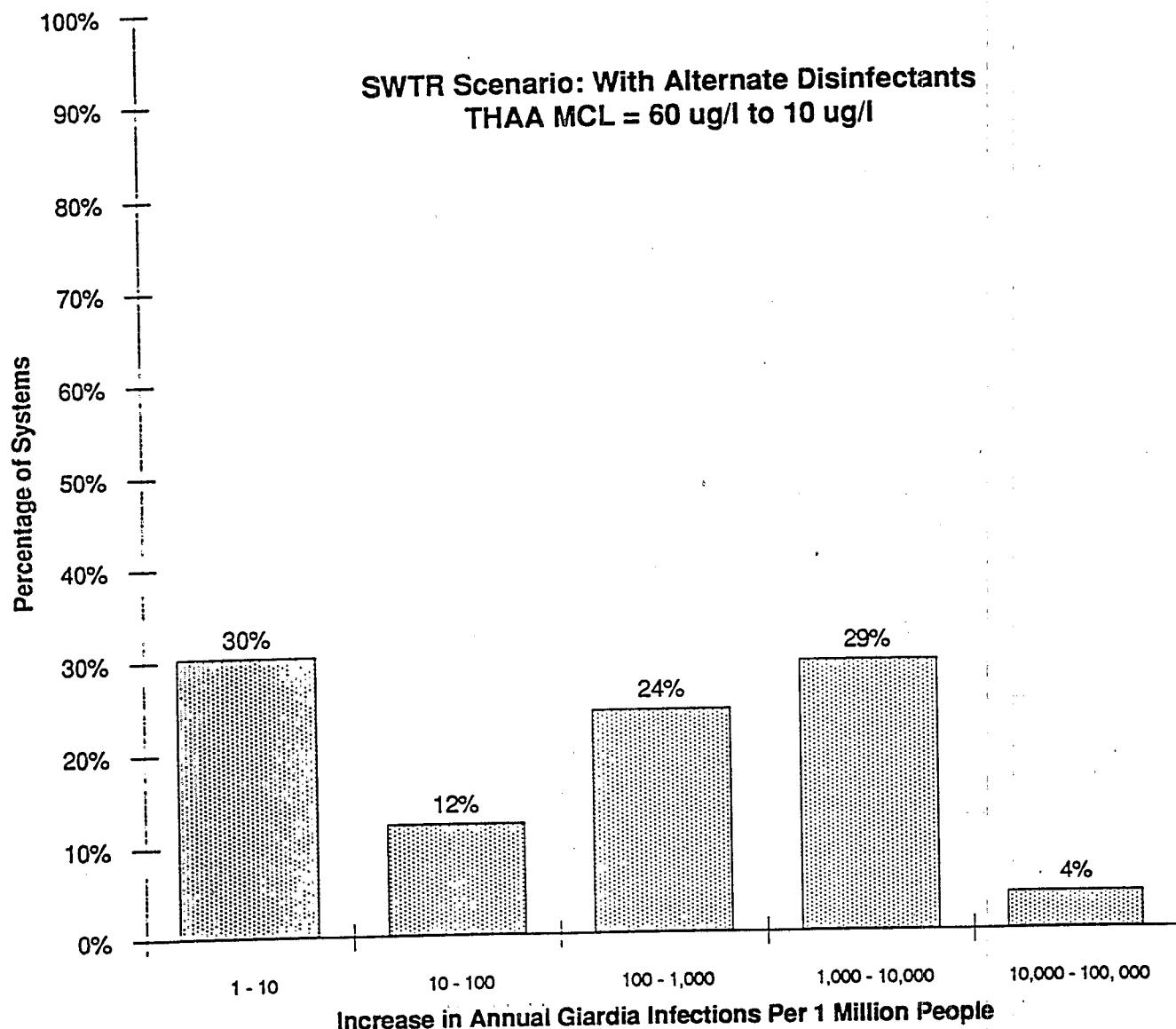


Exhibit 29

**SWTR Scenario: With Alternate Disinfectants**

**From THAA MCL = 60 ug/l to 50 ug/l  
Change in Risks Per 1 Million People**

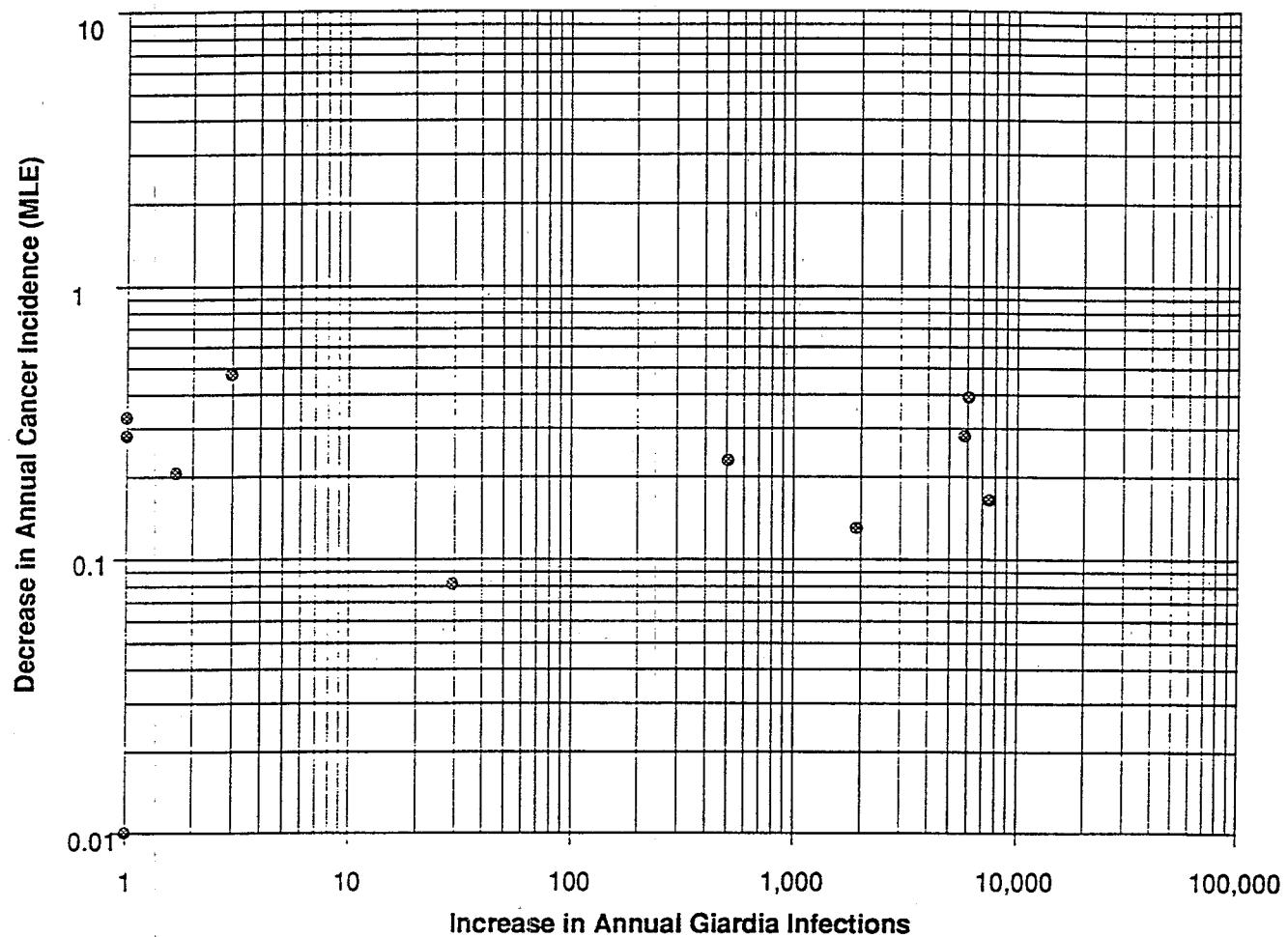
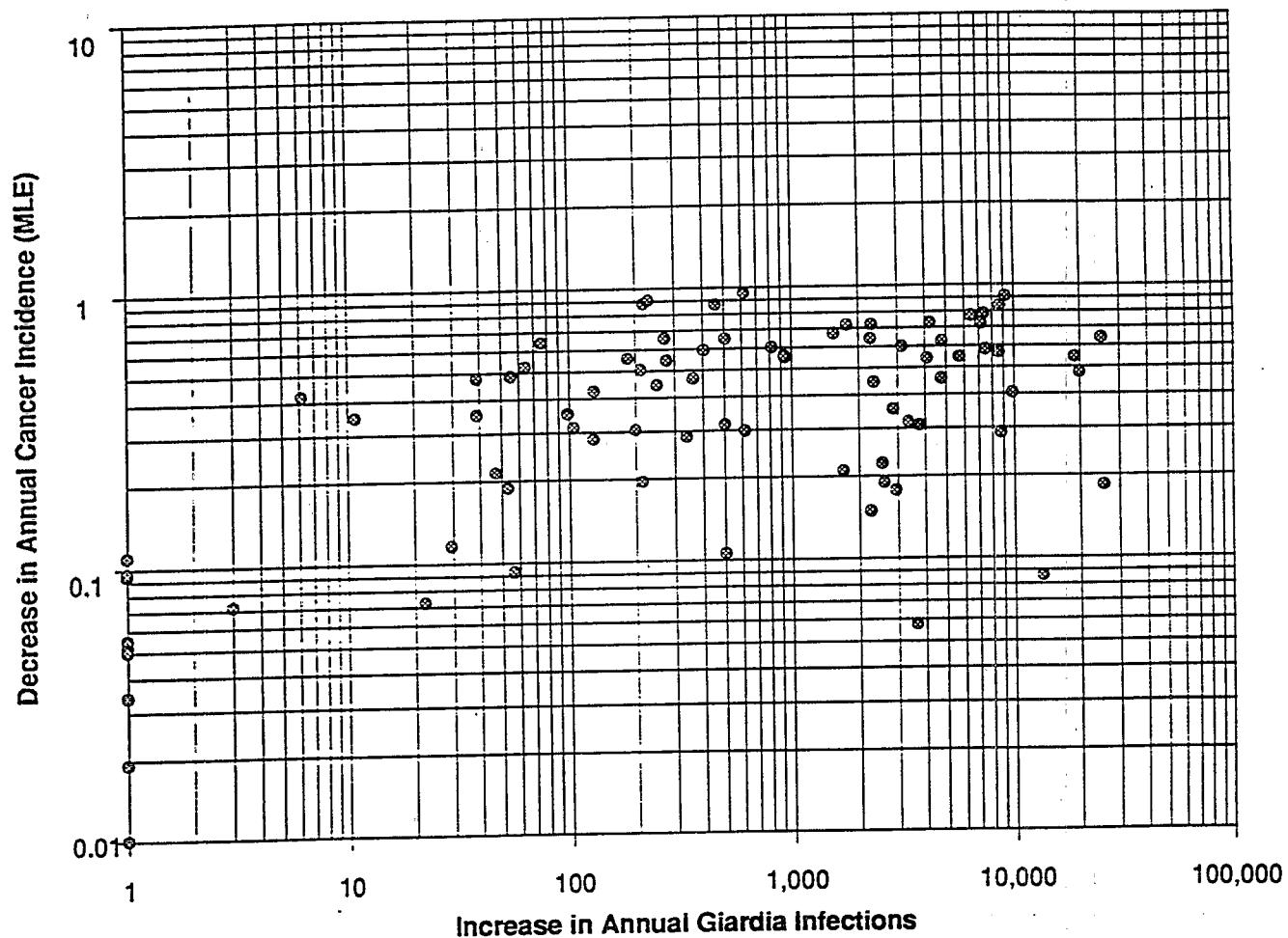


Exhibit 30

**SWTR Scenario: With Alternate Disinfectants**

**THAA MCL = 60 ug/l to 10 ug/l  
Change in Risks Per 1 Million People**



## W/ Alternate Disinfectants

## Exhibit 31

| SWTR Scenario | Total Annual Treatment Cost (\$M/Yr.) * | Total Capital Cost (\$M) | Number of Cancer Cases Remaining/Yr. 95% MLE | Incremental Annual Treatment Cost (\$M/Yr.) | Incremental Cost Per Case of Cancer Avoided (\$M/case) 95% MLE | Incremental Number of Cancer Cases Avoided/Year 95% MLE |
|---------------|-----------------------------------------|--------------------------|----------------------------------------------|---------------------------------------------|----------------------------------------------------------------|---------------------------------------------------------|
| TIIAA MCLs    |                                         |                          |                                              |                                             |                                                                |                                                         |
| 60            | 2                                       | 17                       | 139                                          | 45                                          | -                                                              | -                                                       |
| 50            | 12                                      | 20                       | 131                                          | 42                                          | 1                                                              | 8                                                       |
| 40            | 21                                      | 61                       | 118                                          | 38                                          | 1                                                              | 2                                                       |
| 30            | 71                                      | 266                      | 101                                          | 32                                          | 3                                                              | 13                                                      |
| 20            | 383                                     | 2,433                    | 69                                           | 22                                          | 3                                                              | 17                                                      |
| 10            | 922                                     | 6,547                    | 35                                           | 11                                          | 10                                                             | 17                                                      |

| ESWTR Scenario | Total Annual Treatment Cost (\$M/Yr.) * | Total Capital Cost (\$M) | Number of Cancer Cases Remaining/Yr. 95% MLE | Incremental Annual Treatment Cost (\$M/Yr.) | Incremental Cost Per Case of Cancer Avoided (\$M/case) 95% MLE | Incremental Number of Cancer Cases Avoided/Year 95% MLE |
|----------------|-----------------------------------------|--------------------------|----------------------------------------------|---------------------------------------------|----------------------------------------------------------------|---------------------------------------------------------|
| TIIAA MCLs     |                                         |                          |                                              |                                             |                                                                |                                                         |
| 60             | 7                                       | 18                       | 143                                          | 46                                          | -                                                              | -                                                       |
| 50             | 16                                      | 55                       | 135                                          | 43                                          | 1                                                              | 3                                                       |
| 40             | 38                                      | 94                       | 122                                          | 39                                          | 2                                                              | 5                                                       |
| 30             | 120                                     | 504                      | 101                                          | 32                                          | 4                                                              | 12                                                      |
| 20             | 422                                     | 2,737                    | 69                                           | 22                                          | 10                                                             | 21                                                      |
| 10             | 963                                     | 6,887                    | 35                                           | 11                                          | 16                                                             | 30                                                      |

\* Costs are annualized at 10% interest rate over 20 years.

**Exhibit 32**

Draft: 13-May-92

**W/out Alternate Disinfectants**

| SWTR Scenario | Total Annual Treatment Cost (\$M/Yr.) * | Total Capital Cost (\$M) | Number of Cancer Cases Remaining/Yr. 95% MLE | Incremental Annual Treatment Cost (\$M/Yr.) | Incremental Cost Per Case of Cancer Avoided (\$M/case) 95% MLE | Incremental Number of Cancer Cases Avoided/Year 95% MLE |
|---------------|-----------------------------------------|--------------------------|----------------------------------------------|---------------------------------------------|----------------------------------------------------------------|---------------------------------------------------------|
| TIIAA MCLs    |                                         |                          |                                              |                                             |                                                                |                                                         |
| 60            | 104                                     | 788                      | 130                                          | 42                                          | —                                                              | —                                                       |
| 50            | 118                                     | 889                      | 124                                          | 40                                          | 3                                                              | 5                                                       |
| 40            | 202                                     | 1,524                    | 105                                          | 34                                          | 4                                                              | 6                                                       |
| 30            | 353                                     | 2,668                    | 80                                           | 26                                          | 6                                                              | 19                                                      |
| 20            | 588                                     | 4,446                    | 55                                           | 18                                          | 9                                                              | 25                                                      |
| 10            | 957                                     | 7,240                    | 31                                           | 10                                          | 15                                                             | 26                                                      |
|               |                                         |                          |                                              |                                             |                                                                | 8                                                       |

| ESWTR Scenario | Total Annual Treatment Cost (\$M/Yr.) * | Total Capital Cost (\$M) | Number of Cancer Cases Remaining/Yr. 95% MLE | Incremental Annual Treatment Cost (\$M/Yr.) | Incremental Cost Per Case of Cancer Avoided (\$M/case) 95% MLE | Incremental Number of Cancer Cases Avoided/Year 95% MLE |
|----------------|-----------------------------------------|--------------------------|----------------------------------------------|---------------------------------------------|----------------------------------------------------------------|---------------------------------------------------------|
| TIIAA MCLs     |                                         |                          |                                              |                                             |                                                                |                                                         |
| 60             | 118                                     | 889                      | 131                                          | 42                                          | —                                                              | —                                                       |
| 50             | 118                                     | 889                      | 124                                          | 40                                          | 0                                                              | 0                                                       |
| 40             | 218                                     | 1,651                    | 105                                          | 34                                          | 5                                                              | 16                                                      |
| 30             | 336                                     | 2,541                    | 82                                           | 26                                          | 118                                                            | 19                                                      |
| 20             | 588                                     | 4,446                    | 55                                           | 18                                          | 252                                                            | 23                                                      |
| 10             | 974                                     | 7,368                    | 30                                           | 10                                          | 386                                                            | 27                                                      |
|                |                                         |                          |                                              |                                             | 15                                                             | 29                                                      |
|                |                                         |                          |                                              |                                             | 47                                                             | 25                                                      |
|                |                                         |                          |                                              |                                             |                                                                | 8                                                       |

\* Costs are annualized at 10% interest rate over 20 years.

Exhibit 33

## Compliance Percentages

| SWTR Scenario<br>W/ Alt. Disin.   | THAA MCLs (ug/l) |    |    |    |    |    |
|-----------------------------------|------------------|----|----|----|----|----|
|                                   | 60               | 50 | 40 | 30 | 20 | 10 |
| No further treatment              | 70               | 64 | 56 | 48 | 37 | 19 |
| Eliminate pre-chlor               | 12               | 15 | 16 | 12 | 8  | 3  |
| Eliminate pre-chlor & add NH3     | 18               | 17 | 22 | 22 | 8  | 1  |
| pre-chlor + NH3 + alum dose       | 0                | 4  | 5  | 14 | 23 | 22 |
| pre-chlor + NH3 + alum + Oz       | 0                | 0  | 1  | 3  | 7  | 5  |
| pre-chlor + NH3 + alum + Oz + GAC | 0                | 0  | 0  | 1  | 17 | 50 |

## Compliance Percentages

| Enhanced SWTR Scenario<br>W/ Alt. Disin. | THAA MCLs (ug/l) |    |    |    |    |    |
|------------------------------------------|------------------|----|----|----|----|----|
|                                          | 60               | 50 | 40 | 30 | 20 | 10 |
| No further treatment                     | 70               | 62 | 56 | 47 | 35 | 17 |
| Eliminate pre-chlor                      | 11               | 16 | 16 | 12 | 10 | 3  |
| Eliminate pre-chlor & add NH3            | 17               | 18 | 16 | 12 | 4  | 0  |
| pre-chlor + NH3 + alum dose              | 2                | 3  | 10 | 18 | 18 | 15 |
| pre-chlor + NH3 + alum + Oz              | 0                | 1  | 2  | 10 | 16 | 15 |
| pre-chlor + NH3 + alum + Oz + GAC        | 0                | 0  | 0  | 1  | 17 | 50 |

Exhibit 34

### Compliance Percentages

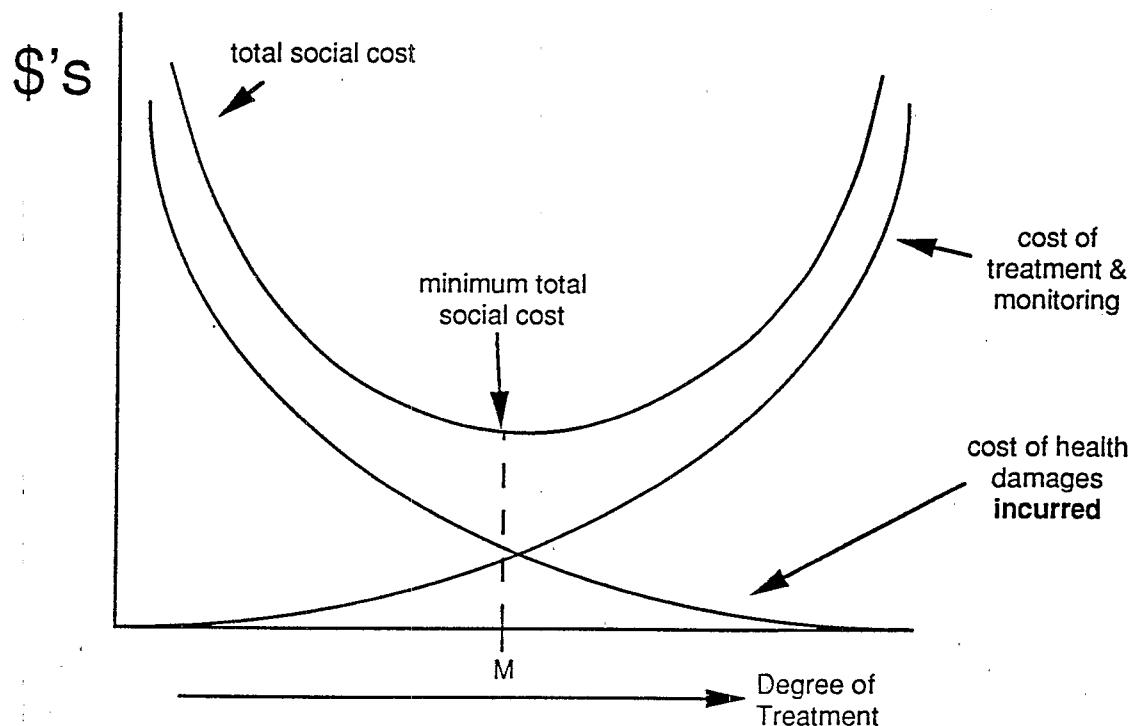
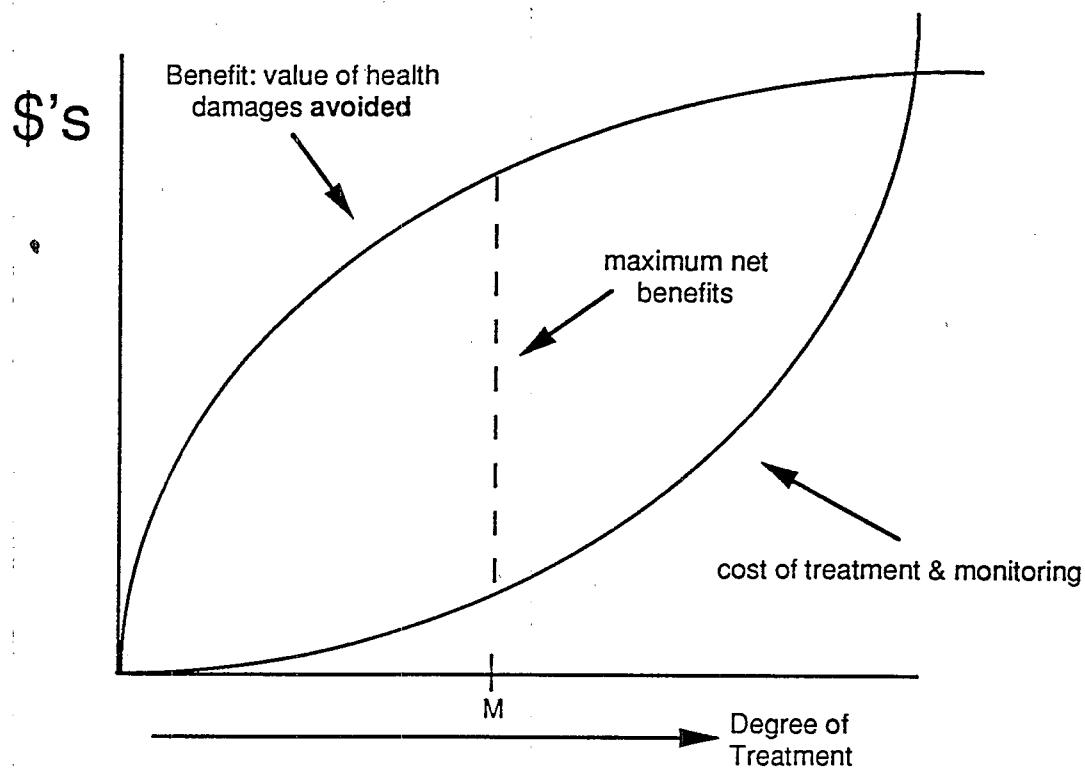
| SWTR Scenario<br>W/out Alt. Disin. | THAA MCLs (ug/l) |    |    |    |    |    |
|------------------------------------|------------------|----|----|----|----|----|
|                                    | 60               | 50 | 40 | 30 | 20 | 10 |
| No further treatment               | 70               | 64 | 56 | 48 | 37 | 19 |
| Eliminate pre-chlor                | 12               | 15 | 16 | 12 | 8  | 3  |
| Eliminate pre-chlor & modify alum  | 11               | 14 | 16 | 19 | 20 | 21 |
| Eliminate pre-chlor + alum + GAC   | 7                | 7  | 12 | 21 | 35 | 57 |

### Compliance Percentages

| Enhanced SWTR Scenario<br>W/out Alt. Disin. | THAA MCLs (ug/l) |    |    |    |    |    |
|---------------------------------------------|------------------|----|----|----|----|----|
|                                             | 60               | 50 | 40 | 30 | 20 | 10 |
| No further treatment                        | 70               | 62 | 56 | 47 | 35 | 17 |
| Eliminate pre-chlor                         | 11               | 16 | 16 | 12 | 10 | 3  |
| Eliminate pre-chlor & modify alum           | 12               | 15 | 15 | 21 | 20 | 22 |
| Eliminate pre-chlor + alum + GAC            | 7                | 7  | 13 | 20 | 35 | 58 |

Exhibit 35

# Equivalence of “Maximum Net Benefit” and “Minimum Total Social Cost” Objectives



Maximizing Health Damages Avoided  
Per Dollar of Treatment Expenditure



Minimizing Health Damages Incurred  
Per Dollar of Treatment Expenditure

## Exhibit 36

**MODEL OUTPUT (surface w/o softening): SWTR W/ ALTERNATIVE DISINFECTION****Treatment Code:**

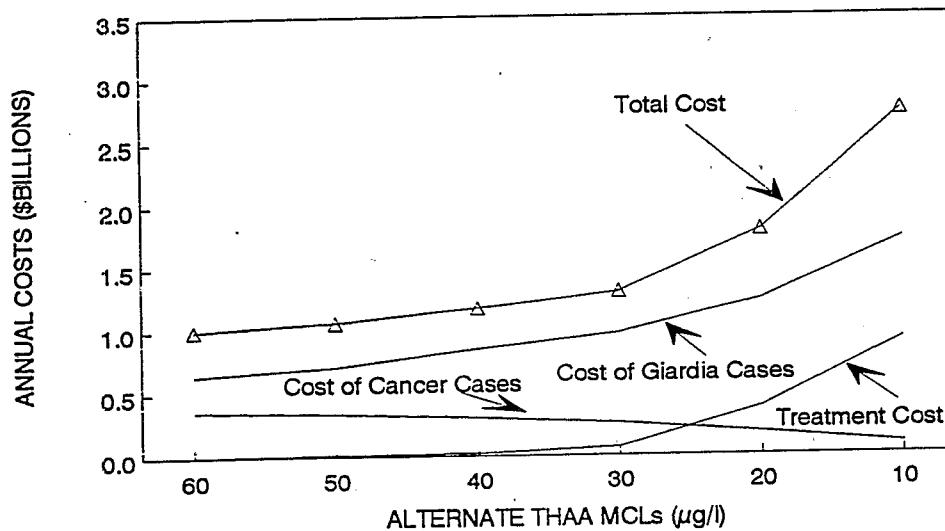
- 1 — not requiring further treatment modification
- 2 — eliminate pre-chlorination
- 3 — eliminate pre-chlor + add ammonia
- 4 — pre-chlor + ammonia + alum dose
- 5 — pre-chlor + ammonia + alum + ozone
- 6 — pre-chlor + ammonia + alum + ozone + GAC

*Population =* 103,000,000 (persons)

| THAA MCL ( $\mu\text{g/l}$ ) | Annual Treatment Cost * (\$M) | Cost of Cancer** @ \$8m/case (\$M) | Cost of Giardia @ \$3,000/case (\$M) | Total Costs (\$M) |
|------------------------------|-------------------------------|------------------------------------|--------------------------------------|-------------------|
| 60                           | 2                             | 358                                | 639                                  | 1,000             |
| 50                           | 12                            | 338                                | 714                                  | 1,064             |
| 40                           | 21                            | 304                                | 849                                  | 1,174             |
| 30                           | 71                            | 259                                | 974                                  | 1,304             |
| 20                           | 383                           | 177                                | 1,239                                | 1,798             |
| 10                           | 922                           | 91                                 | 1,729                                | 2,742             |

\* Capital costs are annualized at 10% interest rate over 20 years.

\*\* MLE of cancer incidence from HAAs.



## Exhibit 37

**MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/ ALTERNATIVE DISINFECTION****Treatment Code:**

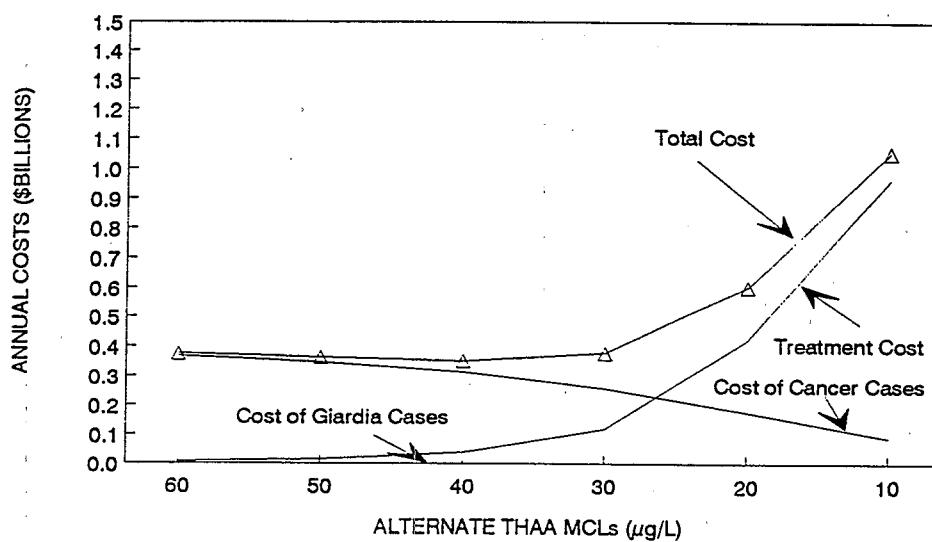
- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + add ammonia
- 4 – pre-chlor + ammonia + alum dose
- 5 – pre-chlor + ammonia + alum + ozone
- 6 – pre-chlor + ammonia + alum + ozone + GAC

**Population =** 103,000,000 (persons)

| THAA<br>MCL<br>( $\mu\text{g/l}$ ) | Annual<br>Treatment Cost *<br>(\$M) | Cost of Cancer**<br>@ \$8m/case<br>(\$M) | Cost of Giardia<br>@ \$3,000/case<br>(\$M) | Total<br>Costs<br>(\$M) |
|------------------------------------|-------------------------------------|------------------------------------------|--------------------------------------------|-------------------------|
| 60                                 | 7                                   | 369                                      | 0.8                                        | 377                     |
| 50                                 | 16                                  | 348                                      | 0.8                                        | 364                     |
| 40                                 | 38                                  | 313                                      | 0.9                                        | 351                     |
| 30                                 | 120                                 | 258                                      | 1.0                                        | 379                     |
| 20                                 | 422                                 | 178                                      | 1.0                                        | 601                     |
| 10                                 | 963                                 | 91                                       | 1.0                                        | 1,055                   |

\* Capital costs are annualized at 10% interest rate over 20 years.

\*\* MLE of cancer incidence from HAAs.



## MODEL OUTPUT (surface w/o softening): SWTR W/O ALTERNATIVE DISINFECTION

## Treatment Code:

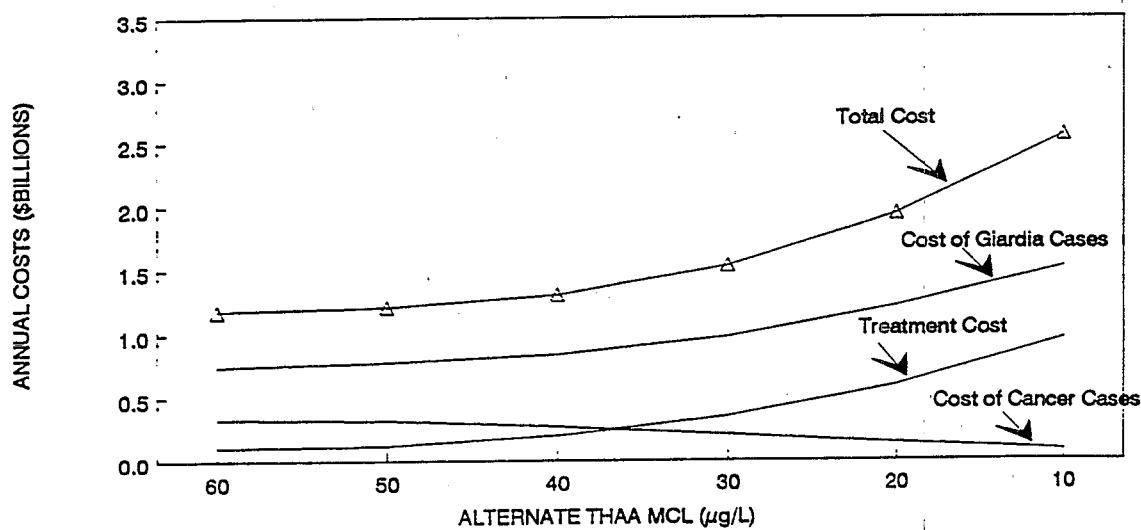
- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + modify alum dose
- 4 – pre-chlor + alum dose + GAC

*Population =* 103,000,000 (persons)

| THAA MCL ( $\mu\text{g/l}$ ) | Annual Treatment Cost * (\$M) | Cost of Cancer** @ \$8m/case (\$M) | Cost of Giardia @ \$3,000/case (\$M) | Total Costs (\$M) |
|------------------------------|-------------------------------|------------------------------------|--------------------------------------|-------------------|
| 60                           | 104                           | 334                                | 740                                  | 1,177             |
| 50                           | 118                           | 320                                | 772                                  | 1,210             |
| 40                           | 202                           | 270                                | 831                                  | 1,303             |
| 30                           | 353                           | 206                                | 972                                  | 1,531             |
| 20                           | 588                           | 140                                | 1,212                                | 1,940             |
| 10                           | 957                           | 79                                 | 1,519                                | 2,555             |

\* Capital costs are annualized at 10% interest rate over 20 years.

\*\* MLE of cancer incidence from HAAs.



## Exhibit 39

**MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/O ALTERNATIVE DISINFECTION****Treatment Code:**

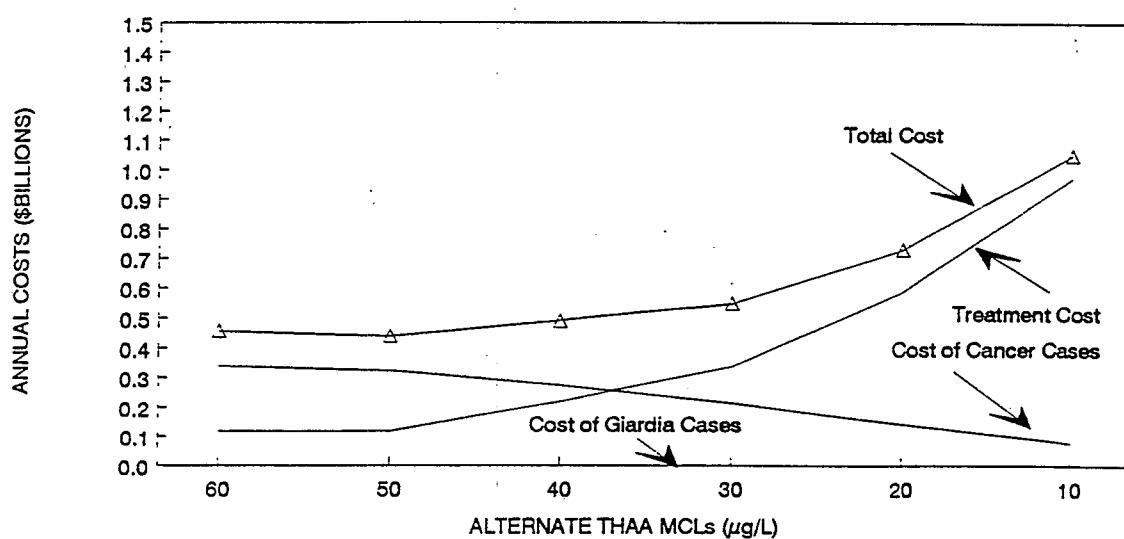
- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + modify alum dose
- 4 – pre-chlor + alum dose + GAC

*Population =* 103,000,000 (persons)

| THAA<br>MCL<br>( $\mu\text{g/l}$ ) | Ann.Trt.*<br>Cost<br>(\$M) | Cost of Cancer**<br>@ \$8m/case<br>(\$M) | Cost of Giardia<br>@ \$3,000/case<br>(\$M) | Total<br>Costs<br>(\$M) |
|------------------------------------|----------------------------|------------------------------------------|--------------------------------------------|-------------------------|
| 60                                 | 118                        | 337                                      | 0.8                                        | 455                     |
| 50                                 | 118                        | 320                                      | 0.8                                        | 438                     |
| 40                                 | 218                        | 271                                      | 0.8                                        | 490                     |
| 30                                 | 336                        | 211                                      | 1.0                                        | 548                     |
| 20                                 | 588                        | 142                                      | 1.0                                        | 731                     |
| 10                                 | 974                        | 77                                       | 1.0                                        | 1,052                   |

\* Capital costs are annualized at 10% interest rate over 20 years.

\*\* MLE of cancer incidence from HAAs.



**Model Output (surface water systems w/o softening) : SWTR w/ MODIFYING ALUM DOSE**
**Treatment Tier Code:**

- 1 - not requiring further treatment modification  
 2 - eliminating prechlorination + modifying alum dose

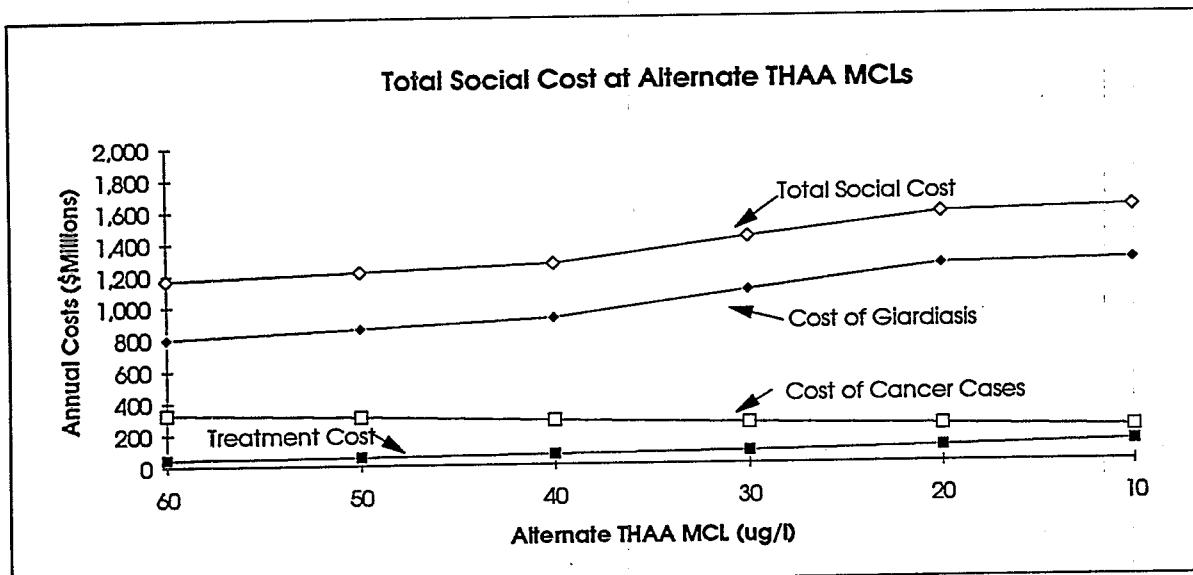
**Population =** 103,000,000 (persons)      **Number of Systems =** 977

| THAA MCL (ug/l) | Treatment Code | % of Systems Modifying Alum Dose* | Cumulative % of Systems <= MCL* | Annual Treatment Cost (\$M) ** | Cost (\$M) of Cancer *** @ \$8M/Case | Cost (\$M) of Giardiasis @ \$3K/Case | Total Social Cost (\$M) |
|-----------------|----------------|-----------------------------------|---------------------------------|--------------------------------|--------------------------------------|--------------------------------------|-------------------------|
| (1)             | (2)            | (3)                               | (1)+(2)+(3)                     |                                |                                      |                                      |                         |
| 60              | 2              | 30                                | 93                              | 45                             | 326                                  | 796                                  | 1,167                   |
| 50              | 2              | 36                                | 93                              | 54                             | 303                                  | 853                                  | 1,210                   |
| 40              | 2              | 44                                | 88                              | 66                             | 275                                  | 917                                  | 1,258                   |
| 30              | 2              | 52                                | 79                              | 78                             | 254                                  | 1,086                                | 1,418                   |
| 20              | 2              | 63                                | 65                              | 95                             | 234                                  | 1,237                                | 1,565                   |
| 10              | 2              | 81                                | 43                              | 122                            | 215                                  | 1,261                                | 1,597                   |

\* Includes 20% over-design factor.

\*\* Maximum Likelihood Estimates (MLE) of cancer incidence associated with HAAs.

\*\*\* Capital costs are annualized at 10% interest rate over 20 years.



**Model Output (surface water systems w/o softening) : Enhanced SWTR w/ MODIFYING ALUM DOSE**
**Treatment Tier Code:**

- 1 - not requiring further treatment modification  
 2 - eliminating prechlorination + modifying alum dose

Population =

103,000,000 (persons)

Number of Systems =

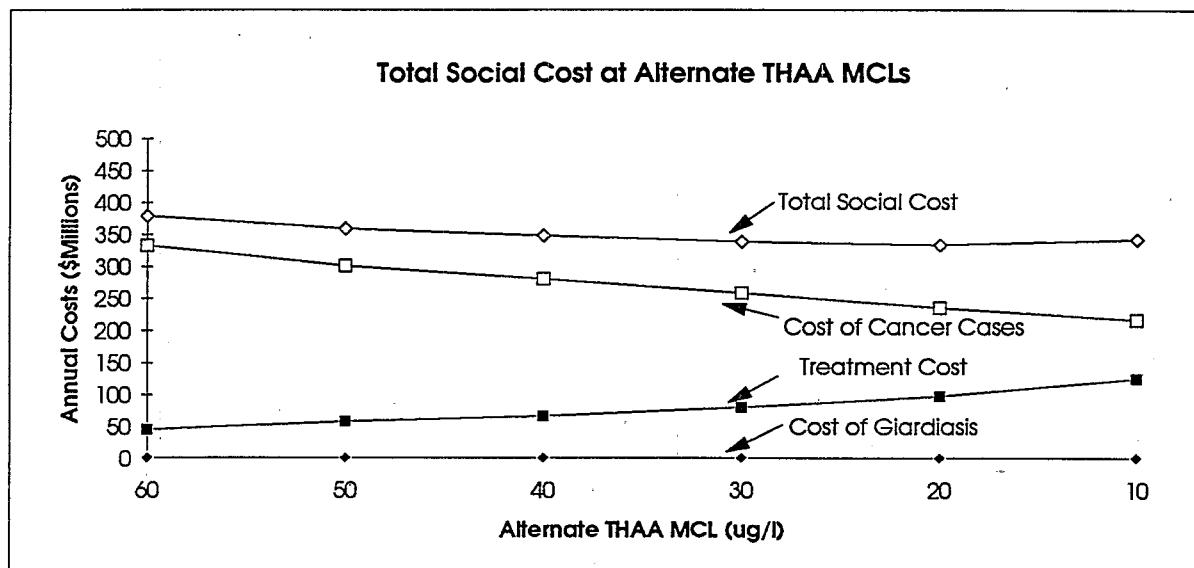
277

| THAA MCL (ug/l) | Treatment Code | % of Systems Modifying Alum Dose* | Cumulative % of Systems <= MCL* | Annual Treatment Cost (\$M) ** | Cost (\$M) of Cancer *** @ \$8M/Case | Cost (\$M) of Giardiasis @ \$3K/Case | Total Social Cost (\$M) |
|-----------------|----------------|-----------------------------------|---------------------------------|--------------------------------|--------------------------------------|--------------------------------------|-------------------------|
| 60              | 2              | 30                                | 93                              | 45                             | 332                                  | 0.8                                  | 378                     |
| 50              | 2              | 38                                | 93                              | 57                             | 300                                  | 0.8                                  | 358                     |
| 40              | 2              | 44                                | 87                              | 66                             | 280                                  | 0.9                                  | 348                     |
| 30              | 2              | 53                                | 80                              | 80                             | 258                                  | 1.0                                  | 339                     |
| 20              | 2              | 65                                | 65                              | 98                             | 235                                  | 1.0                                  | 333                     |
| 10              | 2              | 83                                | 42                              | 125                            | 216                                  | 1.0                                  | 342                     |

\* Includes 20% over-design factor.

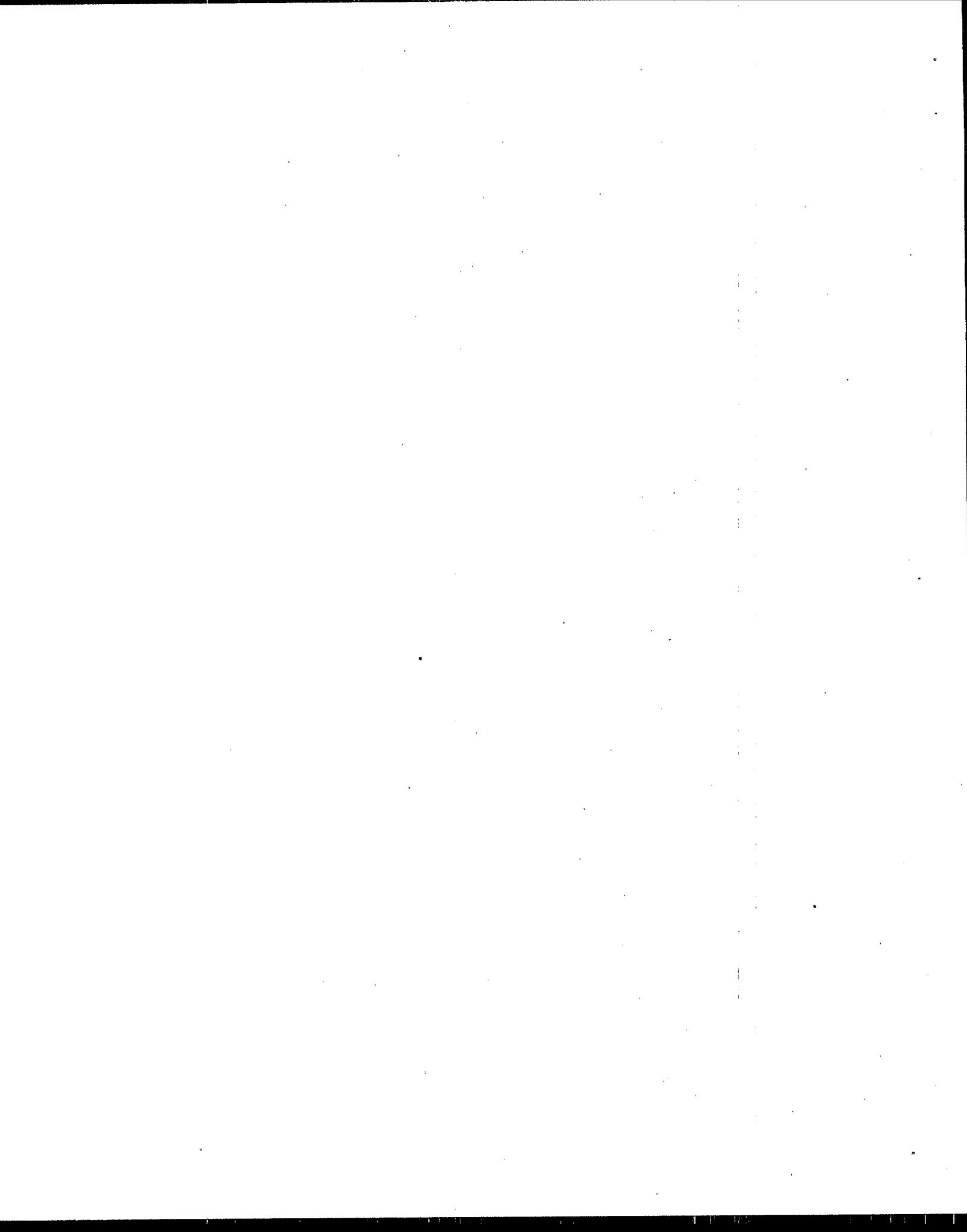
\*\* Maximum Likelihood Estimates (MLE) of cancer incidence associated with HAAs.

\*\*\* Capital costs are annualized at 10% interest rate over 20 years.





## **Appendix A**



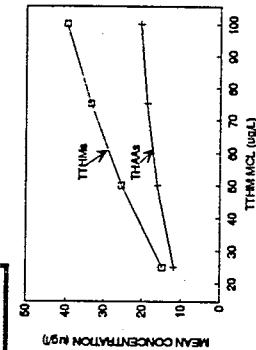
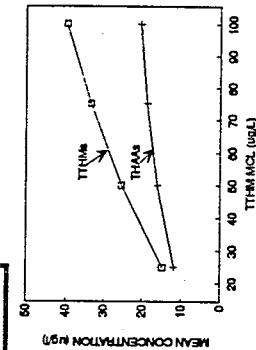
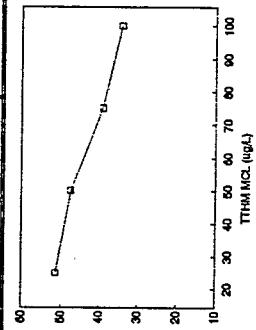
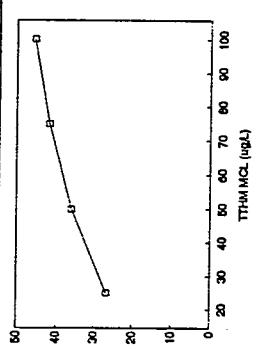
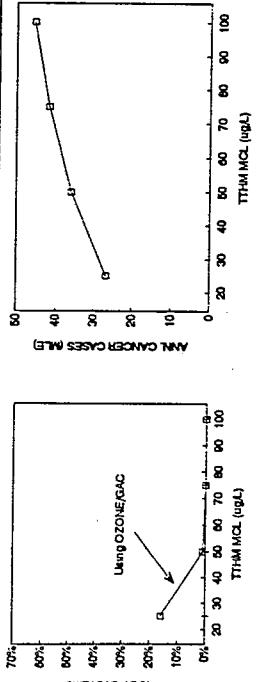
## Exhibit A-1

## MODEL OUTPUT (surface w/o softening): SWTR W/ ALTERNATIVE DISINFECTION

Treatment Code:  
 1 - not requiring further treatment modification  
 2 - eliminate pre-chlorination  
 3 - eliminate pre-chlor + acid ammonia  
 4 - pre-chlor + ammonia + alum dose  
 5 - pre-chlor + ammonia + alum + ozone  
 6 - pre-chlor + ammonia + alum + ozone + GAC

Population = 103,000,000 (persons)

| MCL (THM <sub>x</sub> ) | Trit. Code | % of Sys. Ending <sup>1</sup> | Cumulative % of Sys. < MCL <sup>2</sup> | Mean Concentrations of By-Products (Avg. Qu.) <sup>3</sup> THMs | 95% THMs | MLE  | 95% HAAs | MLE   | 95% HAA5 | MLE     | 95% Giardia Infections | Epidemic <sup>4</sup> Infections | Epidemic <sup>5</sup> Infections (90%) # Yrs. to Outbreak |
|-------------------------|------------|-------------------------------|-----------------------------------------|-----------------------------------------------------------------|----------|------|----------|-------|----------|---------|------------------------|----------------------------------|-----------------------------------------------------------|
| 100                     | 1          | 61                            | 61                                      | 55                                                              | 24       | 33.8 | 1.3      | 153.3 | 49.4     | 340,932 | 2.09                   | Trt.#3                           |                                                           |
| 100                     | 2          | 21                            | 82                                      | 42                                                              | 20       | 27.0 | 1.0      | 136.1 | 43.7     | Trt.#4  |                        |                                  |                                                           |
| 100                     | 3          | 18                            | 100                                     | 40                                                              | 20       | 24.6 | 0.9      | 138.7 | 44.6     | Trt.#5  |                        |                                  |                                                           |
| 100                     | 4          | 0                             | 100                                     | 40                                                              | 20       | 24.6 | 0.9      | 138.7 | 44.6     | Trt.#6  |                        |                                  |                                                           |
| 100                     | 5          | 0                             | 100                                     | 40                                                              | 20       | 24.6 | 0.9      | 138.7 | 44.6     | Trt.#1  |                        |                                  |                                                           |
| 100                     | 6          | 0                             | 100                                     | 40                                                              | 20       | 24.6 | 0.9      | 138.7 | 44.6     | Trt.#2  |                        |                                  |                                                           |
| 75                      | 1          | 49                            | 49                                      | 55                                                              | 24       | 33.8 | 1.3      | 153.3 | 49.4     | 390,216 | 0.16                   | Trt.#3                           |                                                           |
| 75                      | 2          | 25                            | 74                                      | 39                                                              | 19       | 25.0 | 1.0      | 132.1 | 42.5     | Trt.#4  |                        |                                  |                                                           |
| 75                      | 3          | 23                            | 97                                      | 34                                                              | 19       | 21.0 | 0.8      | 129.6 | 41.7     | Trt.#5  |                        |                                  |                                                           |
| 75                      | 4          | 3                             | 100                                     | 33                                                              | 19       | 20.7 | 0.8      | 127.5 | 41.0     | Trt.#6  |                        |                                  |                                                           |
| 75                      | 5          | 0                             | 100                                     | 33                                                              | 19       | 20.7 | 0.8      | 127.5 | 41.0     | Trt.#1  |                        |                                  |                                                           |
| 75                      | 6          | 0                             | 100                                     | 33                                                              | 19       | 20.7 | 0.8      | 127.5 | 41.0     | Trt.#2  |                        |                                  |                                                           |
| 50                      | 1          | 33                            | 33                                      | 55                                                              | 24       | 33.8 | 1.3      | 153.3 | 49.4     | 390,216 | 0.16                   | Trt.#3                           |                                                           |
| 50                      | 2          | 23                            | 56                                      | 37                                                              | 18       | 23.9 | 0.9      | 126.6 | 40.7     | Trt.#4  |                        |                                  |                                                           |
| 50                      | 3          | 34                            | 90                                      | 28                                                              | 17       | 17.4 | 0.7      | 116.8 | 37.5     | Trt.#5  |                        |                                  |                                                           |
| 50                      | 4          | 9                             | 99                                      | 28                                                              | 16       | 16.0 | 0.6      | 110.4 | 35.4     | Trt.#6  |                        |                                  |                                                           |
| 50                      | 5          | 1                             | 100                                     | 25                                                              | 16       | 15.9 | 0.6      | 109.9 | 35.3     | Trt.#1  |                        |                                  |                                                           |
| 50                      | 6          | 0                             | 100                                     | 25                                                              | 16       | 15.9 | 0.6      | 108.9 | 35.3     | Trt.#2  |                        |                                  |                                                           |
| 25                      | 1          | 17                            | 17                                      | 55                                                              | 24       | 33.8 | 1.3      | 153.3 | 49.4     | 474,985 | 0.04                   | Trt.#3                           |                                                           |
| 25                      | 2          | 10                            | 27                                      | 38                                                              | 18       | 23.2 | 0.9      | 124.9 | 40.1     | 513,146 | 0.008                  | Trt.#4                           |                                                           |
| 25                      | 3          | 30                            | 57                                      | 23                                                              | 16       | 14.1 | 0.5      | 107.7 | 34.6     | Trt.#5  |                        |                                  |                                                           |
| 25                      | 4          | 27                            | 84                                      | 17                                                              | 13       | 10.6 | 0.4      | 88.5  | 28.4     | Trt.#6  |                        |                                  |                                                           |
| 25                      | 5          | 13                            | 97                                      | 15                                                              | 12       | 9.9  | 0.4      | 84.6  | 27.2     | Trt.#1  |                        |                                  |                                                           |
| 25                      | 6          | 3                             | 100                                     | 15                                                              | 12       | 9.6  | 0.4      | 81.7  | 26.2     | Trt.#2  |                        |                                  |                                                           |



<sup>1</sup>Percent of systems installing each treatment tier (includes 20% over-design factor)

<sup>2</sup>Cumulative percent of systems able to meet MCL at each treatment tier (includes 20% over-design factor)

<sup>3</sup>Mean concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

<sup>4</sup>Assume 10% of population exposed at first customer

<sup>5</sup>Estimate for 90th percentile

## Exhibit A-2

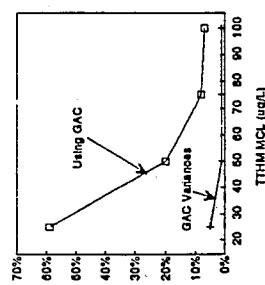
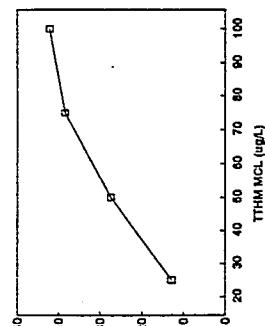
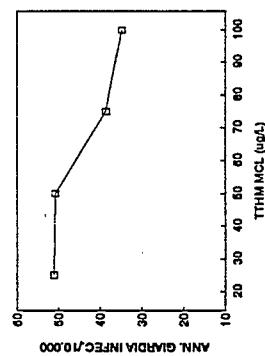
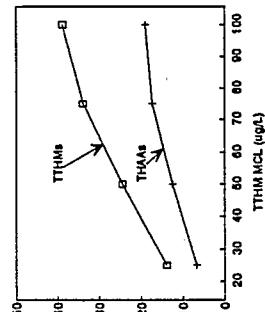
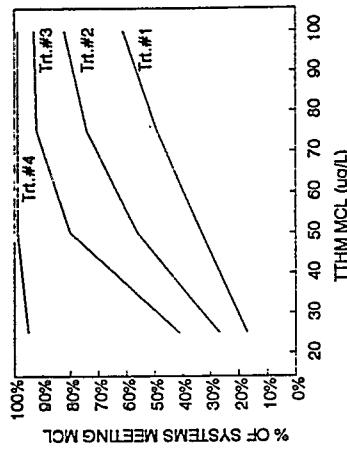
## MODEL OUTPUT (surface w/o softening): SWTR w/o ALTERNATIVE DISINFECTION

Treatment Code:

- 1 - not requiring further treatment modification
- 2 - eliminate pre-chlorination
- 3 - eliminate pre-chlor + modify alum dose
- 4 - pre-chlor + alum dose + GAC

Population = 103,000,000 (present)

| MCL (THMs) | Trit. Code | % Sys. Ending <sup>1</sup> | Cumulative % of Sys. < MCL <sup>2</sup> | Mean Concentrations of By-Products (Avg. Obs.) <sup>3</sup><br>THMs / THAs | Cancer Incidence <sup>4</sup> | Giardia Infections<br>(000) # Yrs. to Outbreak |                                    |                                     |      |
|------------|------------|----------------------------|-----------------------------------------|----------------------------------------------------------------------------|-------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|------|
|            |            |                            |                                         | 85%                                                                        | THMs<br>MLE                   | HAAs<br>MLE                                    | Endemic <sup>5</sup><br>Infections | Epidemic <sup>5</sup><br>Infections |      |
| 100        | 1          | 61                         | 55                                      | 24                                                                         | 33.8                          | 1.3                                            | 153.3                              | 49.4                                |      |
| 100        | 2          | 21                         | 62                                      | 20                                                                         | 27.0                          | 1.0                                            | 136.1                              | 43.7                                |      |
| 100        | 3          | 11                         | 63                                      | 40                                                                         | 20                            | 25.4                                           | 132.6                              | 42.6                                |      |
| 100        | 4          | 7                          | 69                                      | 30                                                                         | 19                            | 24.7                                           | 128.4                              | 41.9                                |      |
| 75         | 1          | 49                         | 55                                      | 24                                                                         | 33.8                          | 1.3                                            | 153.3                              | 49.4                                |      |
| 75         | 2          | 25                         | 74                                      | 39                                                                         | 19                            | 25.0                                           | 1.0                                | 132.1                               | 42.5 |
| 75         | 3          | 18                         | 92                                      | 35                                                                         | 18                            | 22.5                                           | 0.9                                | 122.1                               | 39.2 |
| 75         | 4          | 8                          | 99                                      | 34                                                                         | 17                            | 21.5                                           | 0.8                                | 117.3                               | 37.7 |
| 50         | 1          | 33                         | 33                                      | 55                                                                         | 24                            | 33.8                                           | 1.3                                | 153.3                               | 49.4 |
| 50         | 2          | 23                         | 56                                      | 37                                                                         | 18                            | 23.9                                           | 0.9                                | 126.6                               | 40.7 |
| 50         | 3          | 24                         | 80                                      | 29                                                                         | 15                            | 16.1                                           | 0.7                                | 102.6                               | 33.0 |
| 50         | 4          | 20                         | 89                                      | 24                                                                         | 13                            | 16.4                                           | 0.6                                | 83.3                                | 26.8 |
| 25         | 1          | 17                         | 17                                      | 55                                                                         | 24                            | 33.8                                           | 1.3                                | 153.3                               | 49.4 |
| 25         | 2          | 10                         | 27                                      | 36                                                                         | 18                            | 23.2                                           | 0.9                                | 124.9                               | 40.1 |
| 25         | 3          | 14                         | 41                                      | 26                                                                         | 13                            | 17.3                                           | 0.6                                | 88.5                                | 28.4 |
| 25         | 4          | 59                         | 95                                      | 14                                                                         | 7                             | 10.1                                           | 0.4                                | 39.0                                | 12.5 |



Percent of systems installing each treatment tier (includes 20% over-design factor)  
<sup>2</sup> cumulative percent of systems able to meet MCL at each treatment tier (includes 20% over-design factor)  
<sup>3</sup> mean concentration at each treatment tier of all systems, those meeting MCL and those not meeting MCL  
<sup>4</sup> assumes 10% of population exposed at final customer  
<sup>5</sup> estimate for 90th percentile

## Exhibit A-3

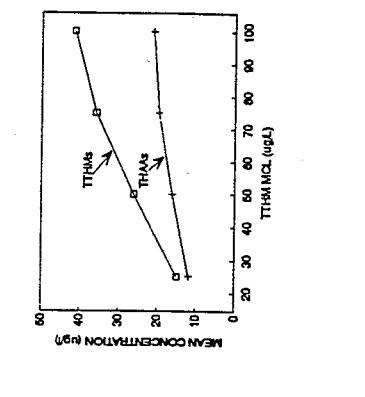
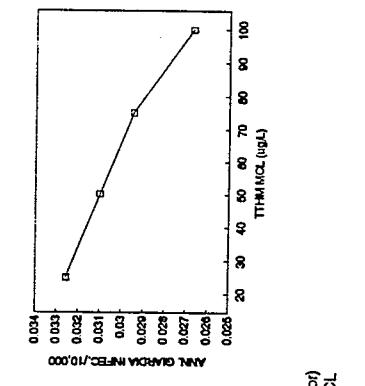
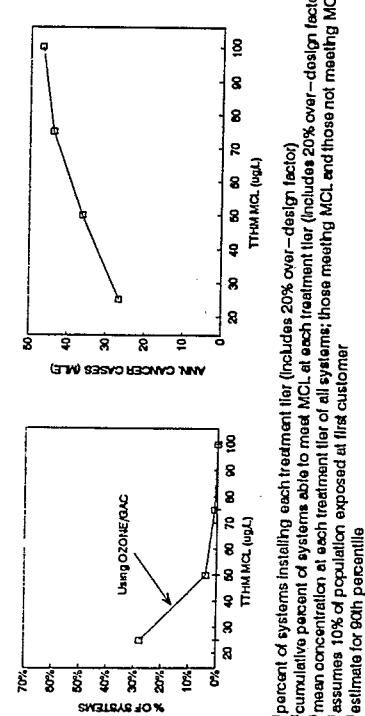
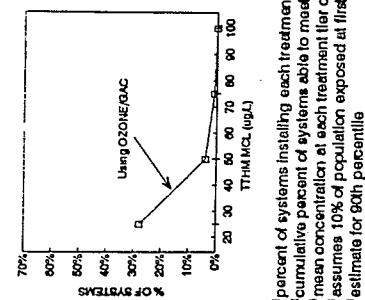
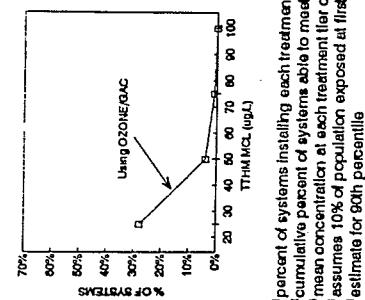
## MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/ ALTERNATIVE DISINFECTION

## Treatment Code:

- 1 - not requiring further treatment modification
- 2 - chlorine pre-chlorination
- 3 - chlorine pre-chlor + add ammonia
- 4 - pre-chlor + ammonia + alum dose
- 5 - pre-chlor + ammonia + alum + ozone
- 6 - pre-chlor + ammonia + alum + ozone + GAC

Population = 103,000,000 (persons)

| MCL<br>(TTHMs) | Tit.<br>Code | % Sys.<br>Ending | Cumulative<br>% Sys.<br>< MCL <sup>1</sup> | Mean Concentrations of<br>By-Products (Avg. Out.) <sup>2</sup> |      |      | Cancer Incidence<br>TTHMs |       |      | HAA <sub>5</sub> <sup>3</sup> |       |       | Glycidyl<br>Inhalants<br>(90%) <sup>4</sup> |       |      | Epidemic<br>Incidence<br>(90%) <sup>5</sup> |       |      |           |           |
|----------------|--------------|------------------|--------------------------------------------|----------------------------------------------------------------|------|------|---------------------------|-------|------|-------------------------------|-------|-------|---------------------------------------------|-------|------|---------------------------------------------|-------|------|-----------|-----------|
|                |              |                  |                                            | TTHMs                                                          |      |      | 85%                       |       |      | MLE                           |       |       | 85%                                         |       |      | MLE                                         |       |      |           |           |
|                |              |                  |                                            | 61                                                             | 61   | 57   | 25                        | 34.8  | 1.3  | 156.3                         | 50.3  | 1.1   | 139.6                                       | 44.9  | 1.0  | 145.3                                       | 46.7  | 287  | hazardous |           |
| 100            | 1            | 61               | 57                                         | 25                                                             | 34.8 | 1.3  | 156.3                     | 50.3  | 1.1  | 139.6                         | 44.9  | 1.0   | 145.3                                       | 46.7  | 1.0  | 142.6                                       | 45.8  | 287  | hazardous |           |
| 100            | 2            | 20               | 81                                         | 44                                                             | 21   | 28.0 | 1.1                       | 139.6 | 44.9 | 1.0                           | 145.3 | 46.7  | 1.0                                         | 142.6 | 45.8 | 1.0                                         | 142.6 | 45.8 | 287       | hazardous |
| 100            | 3            | 16               | 97                                         | 43                                                             | 22   | 26.2 | 1.0                       | 145.3 | 46.7 | 1.0                           | 142.6 | 45.8  | 1.0                                         | 142.6 | 45.8 | 1.0                                         | 142.6 | 45.8 | 287       | hazardous |
| 100            | 4            | 3                | 100                                        | 41                                                             | 21   | 25.8 | 1.0                       | 142.6 | 45.8 | 1.0                           | 142.6 | 45.8  | 1.0                                         | 142.6 | 45.8 | 1.0                                         | 142.6 | 45.8 | 287       | hazardous |
| 100            | 5            | 0                | 100                                        | 41                                                             | 21   | 25.8 | 1.0                       | 142.6 | 45.8 | 1.0                           | 142.6 | 45.8  | 1.0                                         | 142.6 | 45.8 | 1.0                                         | 142.6 | 45.8 | 287       | hazardous |
| 100            | 6            | 0                | 100                                        | 41                                                             | 21   | 25.8 | 1.0                       | 142.6 | 45.8 | 1.0                           | 142.6 | 45.8  | 1.0                                         | 142.6 | 45.8 | 1.0                                         | 142.6 | 45.8 | 287       | hazardous |
| 75             | 1            | 40               | 49                                         | 57                                                             | 25   | 34.8 | 1.3                       | 156.3 | 50.3 | 1.0                           | 139.6 | 43.7  | 1.0                                         | 137.6 | 44.2 | 0.9                                         | 134.3 | 43.2 | 235       | hazardous |
| 75             | 2            | 24               | 73                                         | 41                                                             | 20   | 28.0 | 1.0                       | 139.6 | 43.7 | 22.1                          | 0.9   | 135.5 | 42.9                                        | 22.1  | 0.9  | 135.5                                       | 42.9  | 235  | hazardous |           |
| 75             | 3            | 22               | 95                                         | 38                                                             | 20   | 28.2 | 0.9                       | 137.6 | 44.2 | 22.2                          | 0.9   | 134.3 | 43.2                                        | 22.2  | 0.9  | 134.3                                       | 43.2  | 235  | hazardous |           |
| 75             | 4            | 4                | 99                                         | 36                                                             | 20   | 22.2 | 0.9                       | 137.6 | 44.2 | 22.2                          | 0.9   | 134.3 | 43.2                                        | 22.2  | 0.9  | 134.3                                       | 43.2  | 235  | hazardous |           |
| 75             | 5            | 1                | 100                                        | 36                                                             | 20   | 22.2 | 0.9                       | 137.6 | 44.2 | 22.2                          | 0.9   | 134.3 | 43.2                                        | 22.2  | 0.9  | 134.3                                       | 43.2  | 235  | hazardous |           |
| 75             | 6            | 0                | 100                                        | 36                                                             | 20   | 22.2 | 0.9                       | 137.6 | 44.2 | 22.2                          | 0.9   | 134.3 | 43.2                                        | 22.2  | 0.9  | 134.3                                       | 43.2  | 235  | hazardous |           |
| 50             | 1            | 32               | 32                                         | 57                                                             | 25   | 34.8 | 1.3                       | 156.3 | 50.3 | 1.0                           | 139.6 | 43.7  | 1.0                                         | 137.6 | 44.2 | 1.0                                         | 134.3 | 43.2 | 235       | hazardous |
| 50             | 2            | 22               | 54                                         | 39                                                             | 19   | 24.9 | 0.9                       | 130.4 | 41.9 | 19                            | 0.9   | 130.4 | 41.9                                        | 19    | 0.9  | 130.4                                       | 41.9  | 235  | hazardous |           |
| 50             | 3            | 25               | 79                                         | 33                                                             | 19   | 20.0 | 0.8                       | 126.0 | 40.5 | 19                            | 0.8   | 126.0 | 40.5                                        | 19    | 0.8  | 126.0                                       | 40.5  | 235  | hazardous |           |
| 50             | 4            | 17               | 96                                         | 27                                                             | 17   | 16.9 | 0.6                       | 112.6 | 38.5 | 17                            | 0.6   | 112.6 | 38.5                                        | 17    | 0.6  | 112.6                                       | 38.5  | 235  | hazardous |           |
| 50             | 5            | 4                | 100                                        | 26                                                             | 16   | 16.4 | 0.6                       | 110.4 | 35.5 | 16                            | 0.6   | 110.4 | 35.5                                        | 16    | 0.6  | 110.4                                       | 35.5  | 235  | hazardous |           |
| 50             | 6            | 0                | 100                                        | 26                                                             | 16   | 16.4 | 0.6                       | 110.4 | 35.5 | 16                            | 0.6   | 110.4 | 35.5                                        | 16    | 0.6  | 110.4                                       | 35.5  | 235  | hazardous |           |
| 25             | 1            | 14               | 14                                         | 57                                                             | 25   | 34.8 | 1.3                       | 156.3 | 50.3 | 1.0                           | 139.6 | 43.7  | 1.0                                         | 137.6 | 44.2 | 1.0                                         | 134.3 | 43.2 | 235       | hazardous |
| 25             | 2            | 14               | 28                                         | 37                                                             | 19   | 24.0 | 0.9                       | 126.0 | 41.1 | 19                            | 0.7   | 118.9 | 38.5                                        | 19    | 0.7  | 118.9                                       | 38.5  | 235  | hazardous |           |
| 25             | 3            | 17               | 45                                         | 29                                                             | 18   | 17.4 | 0.7                       | 118.9 | 38.5 | 18                            | 0.7   | 118.9 | 38.5                                        | 18    | 0.7  | 118.9                                       | 38.5  | 235  | hazardous |           |
| 25             | 4            | 27               | 72                                         | 19                                                             | 14   | 12.4 | 0.5                       | 93.9  | 30.2 | 14                            | 0.5   | 93.9  | 30.2                                        | 14    | 0.5  | 93.9                                        | 30.2  | 235  | hazardous |           |
| 25             | 5            | 25               | 97                                         | 15                                                             | 12   | 10.0 | 0.4                       | 84.4  | 27.1 | 12                            | 0.4   | 84.4  | 27.1                                        | 12    | 0.4  | 84.4                                        | 27.1  | 235  | hazardous |           |
| 25             | 6            | 3                | 100                                        | 15                                                             | 12   | 9.6  | 0.4                       | 81.5  | 26.2 | 12                            | 0.4   | 81.5  | 26.2                                        | 12    | 0.4  | 81.5                                        | 26.2  | 235  | hazardous |           |



Percent of systems installing each treatment tier (includes 20% over-design factor)  
 1 mean concentration at each treatment tier (includes 20% over-design factor)  
 2 assumes 10% of population exposed at first customer  
 3 estimate for 90th percentile

## Exhibit A-4

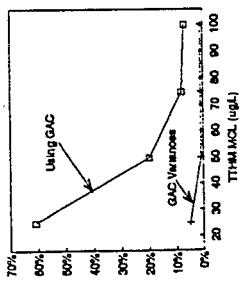
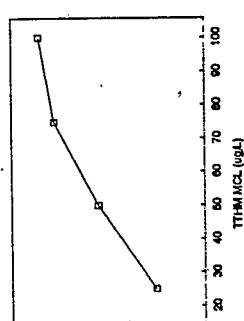
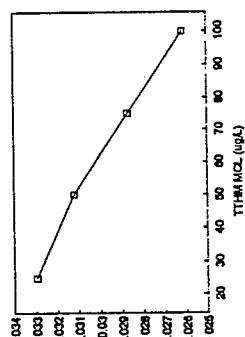
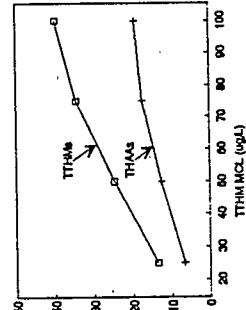
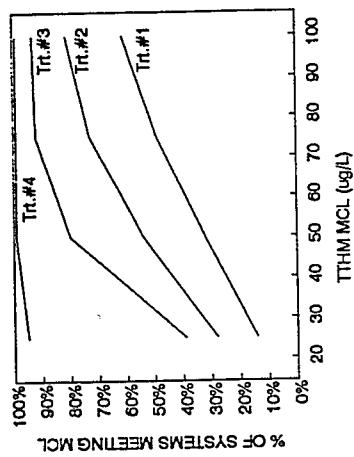
## MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/O ALTERNATIVE DISINFECTION

## Treatment Code:

- 1 - not requiring further treatment modification
- 2 - chlorine pre-chlorination
- 3 - chlorine pre-chlor + modify alum dose
- 4 - pre-chlor + alum dose + GAC

Population = 103,000,000 (persons)

| MCL<br>(TTHMs) | Tit.<br>Code | % Sys.<br>Ending <sup>1</sup> | Cumulative<br>% of Sys.<br>< MCL <sup>2</sup> |      | Mean Concentrations of<br>By-Products (Avg. Out.) <sup>3</sup><br>TTHMs |      |     | Cancer Incidence |      |      | Giardia Infections                 |                                     |                          |
|----------------|--------------|-------------------------------|-----------------------------------------------|------|-------------------------------------------------------------------------|------|-----|------------------|------|------|------------------------------------|-------------------------------------|--------------------------|
|                |              |                               | THMs                                          | THAs | 05%                                                                     | MLE  | 95% | MLE              | 95%  | MLE  | Endemic <sup>4</sup><br>Infections | Epidemic <sup>5</sup><br>Infections | (00%) # yrs. to Outbreak |
| 100            | 1            | 61                            | 61                                            | 57   | 25                                                                      | 34.8 | 1.3 | 156.3            | 50.9 | 50.9 | 44.0                               | 43.3                                | 262                      |
| 100            | 2            | 20                            | 61                                            | 44   | 21                                                                      | 28.0 | 1.1 | 139.6            | 44.0 | 44.0 | 43.3                               | 41.9                                | 262                      |
| 100            | 3            | 12                            | 53                                            | 41   | 20                                                                      | 26.0 | 1.0 | 134.8            | 43.3 | 43.3 | 41.9                               | 41.9                                | 262                      |
| 100            | 4            | 7                             | 90                                            | 40   | 19                                                                      | 25.2 | 1.0 | 130.5            | 41.9 | 41.9 | 41.9                               | 41.9                                | 262                      |
| 75             | 1            | 49                            | 49                                            | 57   | 25                                                                      | 34.8 | 1.3 | 156.3            | 50.3 | 50.3 | 43.7                               | 43.7                                | 262                      |
| 75             | 2            | 24                            | 73                                            | 41   | 20                                                                      | 28.0 | 1.0 | 125.9            | 39.7 | 39.7 | 39.7                               | 39.7                                | 262                      |
| 75             | 3            | 19                            | 92                                            | 36   | 18                                                                      | 22.0 | 0.9 | 123.0            | 39.7 | 39.7 | 38.1                               | 38.1                                | 262                      |
| 75             | 4            | 6                             | 69                                            | 34   | 16                                                                      | 21.0 | 0.8 | 118.0            | 38.1 | 38.1 | 38.1                               | 38.1                                | 262                      |
| 50             | 1            | 32                            | 32                                            | 57   | 25                                                                      | 34.8 | 1.3 | 156.3            | 50.3 | 50.3 | 41.9                               | 41.9                                | 262                      |
| 50             | 2            | 22                            | 54                                            | 39   | 19                                                                      | 24.9 | 0.9 | 130.4            | 41.9 | 41.9 | 33.5                               | 33.5                                | 262                      |
| 50             | 3            | 26                            | 80                                            | 30   | 15                                                                      | 19.3 | 0.7 | 104.2            | 33.5 | 33.5 | 27.1                               | 27.1                                | 312                      |
| 50             | 4            | 20                            | 69                                            | 25   | 13                                                                      | 16.5 | 0.6 | 84.5             | 27.1 | 27.1 | 27.1                               | 27.1                                | 312                      |
| 25             | 1            | 14                            | 14                                            | 57   | 25                                                                      | 34.8 | 1.3 | 156.3            | 50.3 | 50.3 | 41.1                               | 41.1                                | 330                      |
| 25             | 2            | 14                            | 28                                            | 37   | 19                                                                      | 24.0 | 0.9 | 128.0            | 41.1 | 41.1 | 39.6                               | 39.6                                | 330                      |
| 25             | 3            | 11                            | 39                                            | 26   | 13                                                                      | 17.5 | 0.7 | 99.6             | 28.8 | 28.8 | 28.8                               | 28.8                                | 330                      |
| 25             | 4            | 6                             | 65                                            | 14   | 7                                                                       | 9.9  | 0.4 | 38.5             | 12.5 | 12.5 | 12.5                               | 12.5                                | 330                      |

<sup>1</sup> percent of systems installing each treatment tier (Includes 20% over-design factor)<sup>2</sup> cumulative percent of systems able to meet MCL at each treatment tier (Includes 20% over-design factor)<sup>3</sup> mean concentration at each treatment tier (Includes 20% over-design factor)<sup>4</sup> assumes 10% of population exposed at first customer<sup>5</sup> estimate for 90th percentile

## Exhibit A-5

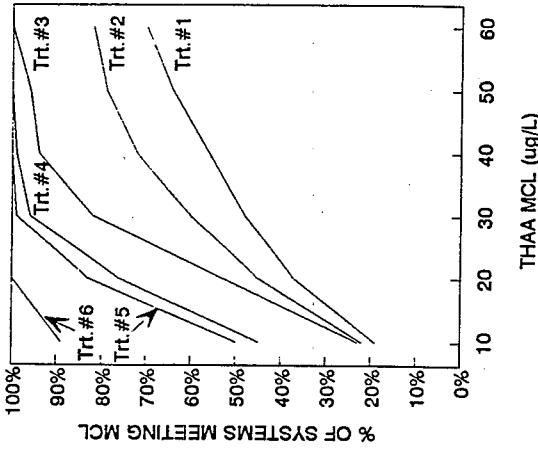
## MODEL OUTPUT (surface w/o softening): SWTR W/ ALTERNATIVE DISINFECTION

Treatment Code:

- 1 - not requiring further treatment modification
- 2 - eliminate pre-chlorination
- 3 - eliminate pre-chlorine + add ammonia

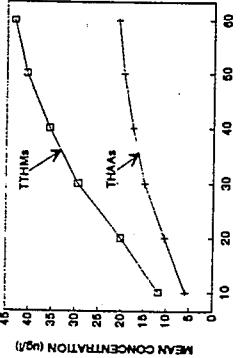
Population = 103,000,000 (persons)

| MCL<br>(THAA) | Trt.<br>Code | % of Sys.<br>Ending<br>< MCL <sup>a</sup> | Mean Concentrations of<br>By-Products (Avg. Out.)<br>THMs |                              | Cancer Incidence<br>THMs<br>85% | MLE  | BS%<br>THMs | Endemic<br>Infections | Glandula Infections<br>(90%) # Yrs. to Outbreak |
|---------------|--------------|-------------------------------------------|-----------------------------------------------------------|------------------------------|---------------------------------|------|-------------|-----------------------|-------------------------------------------------|
|               |              |                                           | Cumulative<br>% Sys.                                      | % Sys.<br>< MCL <sup>b</sup> |                                 |      |             |                       |                                                 |
| 60            | 1            | 70                                        | 70                                                        | 55                           | 24                              | 33.8 | 1.3         | 153.3                 | 49.4                                            |
| 60            | 2            | 12                                        | 82                                                        | 46                           | 21                              | 30.2 | 1.1         | 139.9                 | 45.0                                            |
| 60            | 3            | 18                                        | 100                                                       | 43                           | 21                              | 27.9 | 1.1         | 139.3                 | 44.8                                            |
| 60            | 4            | 0                                         | 100                                                       | 43                           | 21                              | 27.9 | 1.1         | 139.3                 | 44.8                                            |
| 60            | 5            | 0                                         | 100                                                       | 43                           | 21                              | 27.9 | 1.1         | 139.3                 | 44.8                                            |
| 60            | 6            | 0                                         | 100                                                       | 43                           | 21                              | 27.9 | 1.1         | 139.3                 | 44.8                                            |
| 50            | 1            | 64                                        | 64                                                        | 55                           | 24                              | 33.8 | 1.3         | 153.3                 | 49.4                                            |
| 50            | 2            | 15                                        | 78                                                        | 45                           | 20                              | 29.9 | 1.1         | 137.3                 | 44.1                                            |
| 50            | 3            | 17                                        | 96                                                        | 42                           | 20                              | 27.3 | 1.0         | 134.6                 | 43.3                                            |
| 50            | 4            | 4                                         | 100                                                       | 41                           | 20                              | 26.9 | 1.0         | 131.4                 | 42.3                                            |
| 50            | 5            | 0                                         | 100                                                       | 41                           | 20                              | 26.9 | 1.0         | 131.4                 | 42.3                                            |
| 50            | 6            | 0                                         | 100                                                       | 41                           | 20                              | 26.9 | 1.0         | 131.4                 | 42.3                                            |
| 40            | 1            | 56                                        | 56                                                        | 55                           | 24                              | 33.8 | 1.3         | 153.3                 | 49.4                                            |
| 40            | 2            | 16                                        | 72                                                        | 42                           | 19                              | 28.0 | 1.1         | 131.5                 | 42.3                                            |
| 40            | 3            | 22                                        | 94                                                        | 38                           | 18                              | 25.1 | 0.9         | 123.9                 | 39.6                                            |
| 40            | 4            | 5                                         | 99                                                        | 36                           | 18                              | 24.5 | 0.9         | 118.7                 | 38.1                                            |
| 40            | 5            | 1                                         | 100                                                       | 36                           | 17                              | 24.4 | 0.9         | 118.2                 | 38.0                                            |
| 40            | 6            | 0                                         | 100                                                       | 36                           | 17                              | 24.4 | 0.9         | 118.2                 | 38.0                                            |
| 30            | 1            | 48                                        | 48                                                        | 55                           | 24                              | 33.8 | 1.3         | 153.3                 | 49.4                                            |
| 30            | 2            | 12                                        | 60                                                        | 50                           | 19                              | 27.0 | 1.0         | 128.9                 | 41.4                                            |
| 30            | 3            | 22                                        | 62                                                        | 34                           | 17                              | 22.7 | 0.8         | 115.2                 | 37.0                                            |
| 30            | 4            | 14                                        | 96                                                        | 30                           | 15                              | 21.6 | 0.8         | 103.4                 | 33.2                                            |
| 30            | 5            | 3                                         | 99                                                        | 30                           | 15                              | 21.5 | 0.8         | 101.8                 | 32.7                                            |
| 30            | 6            | 1                                         | 100                                                       | 28                           | 16                              | 21.4 | 0.8         | 100.8                 | 32.4                                            |
| 20            | 1            | 37                                        | 37                                                        | 55                           | 24                              | 33.8 | 1.3         | 153.3                 | 49.4                                            |
| 20            | 2            | 6                                         | 45                                                        | 39                           | 18                              | 25.9 | 1.0         | 126.1                 | 40.5                                            |
| 20            | 3            | 8                                         | 53                                                        | 29                           | 18                              | 19.5 | 0.7         | 108.9                 | 35.0                                            |
| 20            | 4            | 23                                        | 76                                                        | 23                           | 13                              | 17.4 | 0.6         | 88.0                  | 28.2                                            |
| 20            | 5            | 7                                         | 83                                                        | 22                           | 12                              | 16.8 | 0.6         | 82.5                  | 26.5                                            |
| 20            | 6            | 17                                        | 100                                                       | 20                           | 10                              | 16.1 | 0.6         | 68.9                  | 22.1                                            |
| 10            | 1            | 10                                        | 19                                                        | 55                           | 24                              | 33.8 | 1.3         | 153.3                 | 49.4                                            |
| 10            | 2            | 3                                         | 22                                                        | 38                           | 18                              | 25.2 | 0.9         | 124.2                 | 39.9                                            |
| 10            | 3            | 1                                         | 23                                                        | 26                           | 16                              | 17.1 | 0.6         | 108.6                 | 34.9                                            |
| 10            | 4            | 22                                        | 45                                                        | 18                           | 12                              | 13.6 | 0.5         | 78.4                  | 25.1                                            |
| 10            | 5            | 5                                         | 50                                                        | 15                           | 10                              | 12.1 | 0.4         | 67.6                  | 21.7                                            |
| 10            | 6            | 50                                        | 50                                                        | 12                           | 6                               | 10.4 | 0.4         | 35.3                  | 11.3                                            |
|               |              |                                           |                                                           |                              |                                 |      |             | 576,480               |                                                 |
|               |              |                                           |                                                           |                              |                                 |      |             | 0.006                 |                                                 |
|               |              |                                           |                                                           |                              |                                 |      |             | 0.018                 |                                                 |
|               |              |                                           |                                                           |                              |                                 |      |             | 0.174                 |                                                 |
|               |              |                                           |                                                           |                              |                                 |      |             | 2.498                 |                                                 |
|               |              |                                           |                                                           |                              |                                 |      |             | 3,036,000             |                                                 |



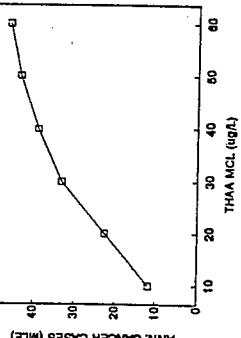
% OF SYSTEMS MEETING MCL

% OF SYSTEMS MEETING MCL



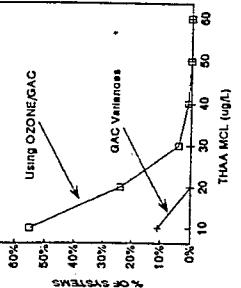
MEAN CONCENTRATION (ug/L)

THAA MCL (ug/L)



ANN CANCER CASES (MLE)

THAA MCL (ug/L)



% OF SYSTEMS

THAA MCL (ug/L)

<sup>a</sup> percent of systems installing each treatment tier (includes 20% over-design factor)  
<sup>b</sup> cumulative percent of systems able to meet MCL at each treatment tier (includes 20% over-design factor)  
<sup>c</sup> assumes 10% of population exposed at first customer  
<sup>d</sup> estimate for 90th percentile

**Exhibit A-6**

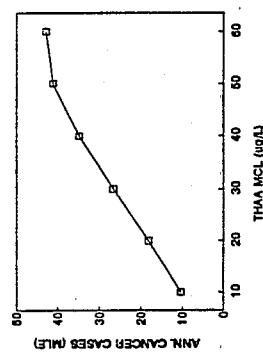
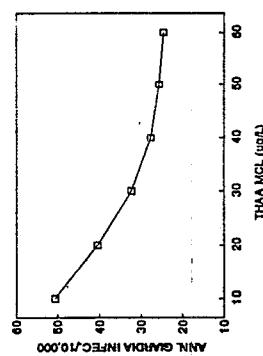
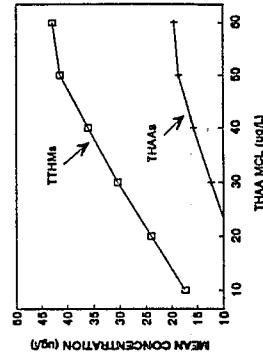
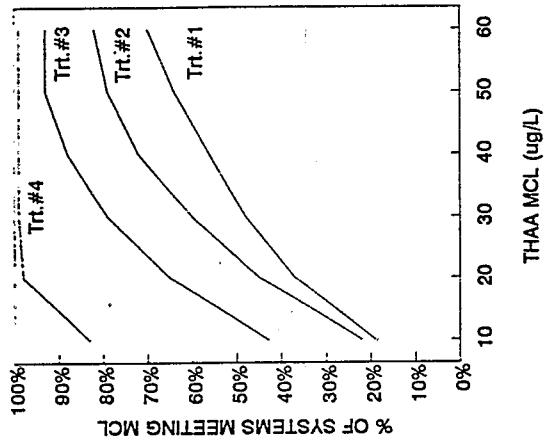
Draft 30-Jan-02

**MODEL OUTPUT (units w/o softening): SWTR W/O ALTERNATIVE DISINFECTION**

- Treatment Codes:  
 1 – not requiring further treatment modification  
 2 – eliminate pre-chlorination  
 3 – eliminate pre-chlor + modify alum dose  
 4 – pre-chlor + alum dose + GAC

Population = 103,660,000 (persons)

| MCL (THAA) | Tit. Code | % Sys. Ending <sup>a</sup> | Cumulative % Sys. < MCL <sup>b</sup> | Mean Concentrations of By-Products (Avg. Out.) THMs |      |      |       | Cancer Incidence |      |       |                                 | Garda Infection <sup>c</sup> Epidemic <sup>d</sup> (%) # Yrs. to Outbreak |         |
|------------|-----------|----------------------------|--------------------------------------|-----------------------------------------------------|------|------|-------|------------------|------|-------|---------------------------------|---------------------------------------------------------------------------|---------|
|            |           |                            |                                      | THMs                                                | 95%  | 99%  | MLE   | THMs             | 95%  | MLE   | Endemic <sup>e</sup> Infections |                                                                           |         |
| 60         | 1         | 70                         | 55                                   | 24                                                  | 33.0 | 1.3  | 165.3 | 40.4             | 1.3  | 130.0 | 45.0                            | 212,089                                                                   |         |
| 60         | 2         | 12                         | 62                                   | 40                                                  | 21   | 30.2 | 1.1   | 130.0            | 43.1 | 1.1   | 120.4                           | 41.3                                                                      | 246,531 |
| 60         | 3         | 11                         | 93                                   | 44                                                  | 20   | 29.2 | 1.1   | 128.7            | 41.7 | 1.0   | 124.5                           | 40.0                                                                      | 257,263 |
| 60         | 4         | 7                          | 86                                   | 43                                                  | 19   | 25.2 | 1.1   | 128.7            | 41.7 | 1.0   | 124.5                           | 40.0                                                                      | 1,091   |
| 50         | 1         | 64                         | 64                                   | 55                                                  | 24   | 33.6 | 1.3   | 153.3            | 49.4 | 1.1   | 131.3                           | 44.1                                                                      |         |
| 50         | 2         | 15                         | 79                                   | 45                                                  | 20   | 28.9 | 1.1   | 131.3            | 44.1 | 1.1   | 126.4                           | 41.3                                                                      |         |
| 50         | 3         | 14                         | 93                                   | 43                                                  | 19   | 28.6 | 1.1   | 128.7            | 41.7 | 1.0   | 124.5                           | 40.0                                                                      |         |
| 50         | 4         | 7                          | 86                                   | 41                                                  | 19   | 27.7 | 1.0   | 128.7            | 41.7 | 1.0   | 124.5                           | 40.0                                                                      |         |
| 40         | 1         | 56                         | 56                                   | 55                                                  | 24   | 33.6 | 1.3   | 153.3            | 49.4 | 1.1   | 131.3                           | 44.1                                                                      |         |
| 40         | 2         | 16                         | 72                                   | 42                                                  | 19   | 28.0 | 1.1   | 131.3            | 44.1 | 1.1   | 126.4                           | 41.3                                                                      |         |
| 40         | 3         | 16                         | 88                                   | 39                                                  | 17   | 26.6 | 1.0   | 126.1            | 42.3 | 1.0   | 121.6                           | 37.5                                                                      |         |
| 40         | 4         | 12                         | 86                                   | 36                                                  | 16   | 25.3 | 0.9   | 105.0            | 33.7 | 0.9   | 105.0                           | 33.7                                                                      | 0.658   |
| 30         | 1         | 48                         | 48                                   | 55                                                  | 24   | 33.8 | 1.3   | 153.3            | 49.4 | 1.0   | 126.1                           | 40.5                                                                      |         |
| 30         | 2         | 12                         | 60                                   | 40                                                  | 19   | 27.0 | 1.0   | 128.9            | 41.4 | 0.9   | 105.1                           | 32.6                                                                      |         |
| 30         | 3         | 19                         | 79                                   | 35                                                  | 16   | 24.6 | 0.9   | 105.1            | 32.6 | 0.8   | 90.3                            | 25.8                                                                      | 0.174   |
| 30         | 4         | 21                         | 89                                   | 30                                                  | 12   | 22.7 | 0.8   | 90.3             | 25.8 | 0.7   | 80.3                            | 22.7                                                                      |         |
| 20         | 1         | 37                         | 37                                   | 55                                                  | 24   | 33.6 | 1.3   | 153.3            | 49.4 | 1.0   | 126.1                           | 40.5                                                                      |         |
| 20         | 2         | 8                          | 45                                   | 39                                                  | 18   | 25.9 | 1.0   | 126.1            | 40.5 | 0.9   | 93.9                            | 30.1                                                                      |         |
| 20         | 3         | 20                         | 65                                   | 31                                                  | 14   | 22.2 | 0.8   | 93.9             | 30.1 | 0.7   | 54.6                            | 17.5                                                                      | 0.034   |
| 20         | 4         | 35                         | 94                                   | 24                                                  | 9    | 19.1 | 0.7   | 54.6             | 17.5 | 0.6   | 403.045                         | 0.034                                                                     |         |
| 10         | 1         | 19                         | 19                                   | 55                                                  | 24   | 33.8 | 1.3   | 153.3            | 49.4 | 0.7   | 124.2                           | 27.1                                                                      |         |
| 10         | 2         | 3                          | 22                                   | 38                                                  | 18   | 25.2 | 0.9   | 124.2            | 27.1 | 0.6   | 39.9                            | 10.6                                                                      |         |
| 10         | 3         | 21                         | 43                                   | 28                                                  | 13   | 20.3 | 0.7   | 84.2             | 27.1 | 0.5   | 20.3                            | 6.0                                                                       |         |
| 10         | 4         | 57                         | 83                                   | 17                                                  | 6    | 14.5 | 0.5   | 30.6             | 6.0  | 0.4   | 506.430                         | 0.008                                                                     |         |



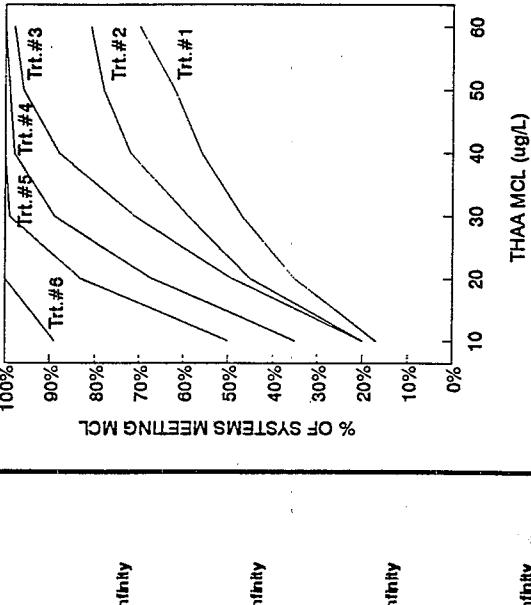
- <sup>a</sup> percent of systems installing each treatment tier (includes 20% over-design factor)  
<sup>b</sup> cumulative percent of systems able to meet MCL at each treatment tier (includes 20% over-design factor)  
<sup>c</sup> mean concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL  
<sup>d</sup> assumes 10% of population exposed at first customer  
<sup>e</sup> estimate for 90th percentile

## Exhibit A-7

## MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/ ALTERNATIVE DISINFECTION

| Treatment Code:                                  |  |  | 4 - pre-chlor + ammonia + alum dose |  | 5 - pre-chlor + ammonia + alum + ozone |  | 6 - pre-chlor + ammonia + alum + ozone + GAC |  |  |  |  |  |  |  |
|--------------------------------------------------|--|--|-------------------------------------|--|----------------------------------------|--|----------------------------------------------|--|--|--|--|--|--|--|
| 1 - not requiring further treatment modification |  |  | 2 - eliminate pre-chlorination      |  | 3 - eliminate pre-chlor + add ammonia  |  |                                              |  |  |  |  |  |  |  |
|                                                  |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| Population = 103,000,000                         |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| (Percent)                                        |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| Cumulative % Sys. < MCL*                         |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| By THMs                                          |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| Mean Concentrations of THMs (ug/L)               |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| % Sys. < MCL*                                    |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| By Product (ug/L)                                |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| THMs                                             |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| 85%                                              |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| MLE                                              |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| 1.3                                              |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| 156.3                                            |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| 50.3                                             |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| Glandular Infection                              |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| Epidemic                                         |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| # Yrs. to Outbreak                               |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |
| (90%)                                            |  |  |                                     |  |                                        |  |                                              |  |  |  |  |  |  |  |

| MCL (THMs) | Tit. Code | % Sys. Ending <sup>1</sup> | % Sys. < MCL* | Cumulative % Sys. < MCL* | THMs | THMs | THMs  | Cancer Incidence | Glandular Infection |  |
|------------|-----------|----------------------------|---------------|--------------------------|------|------|-------|------------------|---------------------|--|
| 60         | 1         | 70                         | 70            | 57                       | 25   | 34.6 | 1.3   | 156.3            | 50.3                |  |
| 60         | 2         | 81                         | 48            | 21                       | 31.2 | 1.2  | 143.2 | 46.1             |                     |  |
| 60         | 3         | 96                         | 46            | 22                       | 29.4 | 1.1  | 144.9 | 46.6             |                     |  |
| 60         | 4         | 100                        | 45            | 22                       | 29.1 | 1.1  | 143.4 | 46.1             |                     |  |
| 60         | 5         | 0                          | 100           | 45                       | 22   | 29.1 | 1.1   | 143.4            | 46.1                |  |
| 60         | 6         | 0                          | 100           | 45                       | 22   | 29.1 | 1.1   | 143.4            | 46.1                |  |
| 50         | 1         | 62                         | 62            | 57                       | 25   | 34.6 | 1.3   | 156.3            | 50.3                |  |
| 50         | 2         | 78                         | 46            | 21                       | 30.7 | 1.2  | 139.5 | 44.8             |                     |  |
| 50         | 3         | 96                         | 44            | 21                       | 28.7 | 1.1  | 139.3 | 44.8             |                     |  |
| 50         | 4         | 99                         | 43            | 20                       | 28.2 | 1.1  | 136.1 | 43.8             |                     |  |
| 50         | 5         | 100                        | 42            | 20                       | 28.1 | 1.1  | 135.3 | 43.5             |                     |  |
| 50         | 6         | 0                          | 100           | 42                       | 20   | 28.1 | 1.1   | 135.3            | 43.5                |  |
| 40         | 1         | 56                         | 56            | 57                       | 25   | 34.6 | 1.3   | 156.3            | 50.3                |  |
| 40         | 2         | 72                         | 44            | 20                       | 29.0 | 1.1  | 135.1 | 42.4             |                     |  |
| 40         | 3         | 88                         | 41            | 20                       | 26.6 | 1.0  | 131.8 | 42.4             |                     |  |
| 40         | 4         | 98                         | 38            | 18                       | 25.9 | 1.0  | 123.2 | 39.6             |                     |  |
| 40         | 5         | 100                        | 37            | 18                       | 25.7 | 1.0  | 121.7 | 39.1             |                     |  |
| 40         | 6         | 0                          | 100           | 37                       | 18   | 25.7 | 1.0   | 121.7            | 39.1                |  |
| 30         | 1         | 47                         | 47            | 57                       | 25   | 34.6 | 1.3   | 156.3            | 50.3                |  |
| 30         | 2         | 59                         | 42            | 19                       | 28.0 | 1.0  | 132.5 | 42.6             |                     |  |
| 30         | 3         | 71                         | 37            | 19                       | 24.8 | 0.9  | 124.9 | 40.2             |                     |  |
| 30         | 4         | 89                         | 32            | 18                       | 22.9 | 0.8  | 107.2 | 34.4             |                     |  |
| 30         | 5         | 100                        | 30            | 15                       | 22.2 | 0.8  | 101.6 | 32.3             |                     |  |
| 30         | 6         | 1                          | 100           | 30                       | 15   | 22.2 | 0.8   | 100.6            | 32.3                |  |
| 20         | 1         | 35                         | 35            | 57                       | 25   | 34.6 | 1.3   | 156.3            | 50.3                |  |
| 20         | 2         | 45                         | 40            | 19                       | 26.8 | 1.0  | 128.0 | 41.4             |                     |  |
| 20         | 3         | 49                         | 33            | 18                       | 22.1 | 0.8  | 120.0 | 38.6             |                     |  |
| 20         | 4         | 67                         | 26            | 14                       | 19.2 | 0.7  | 95.9  | 30.8             |                     |  |
| 20         | 5         | 83                         | 23            | 12                       | 17.5 | 0.6  | 82.9  | 26.6             |                     |  |
| 20         | 6         | 17                         | 100           | 21                       | 10   | 16.9 | 0.6   | 69.3             | 22.2                |  |
| 10         | 1         | 17                         | 17            | 57                       | 25   | 34.6 | 1.3   | 156.3            | 50.3                |  |
| 10         | 2         | 20                         | 39            | 19                       | 26.1 | 1.0  | 127.6 | 41.0             |                     |  |
| 10         | 3         | 0                          | 20            | 31                       | 18   | 20.0 | 0.8   | 122.9            | 39.5                |  |
| 10         | 4         | 15                         | 35            | 21                       | 13   | 15.5 | 0.6   | 88.5             | 28.4                |  |
| 10         | 5         | 50                         | 50            | 16                       | 10   | 12.4 | 0.4   | 67.8             | 21.7                |  |
| 10         | 6         | 50                         | 50            | 12                       | 6    | 10.8 | 0.4   | 35.4             | 11.3                |  |



Titr. #1

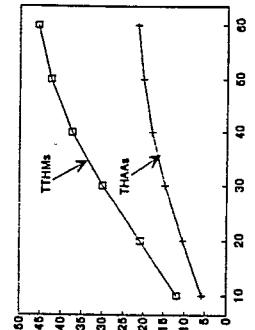
Titr. #2

Titr. #3

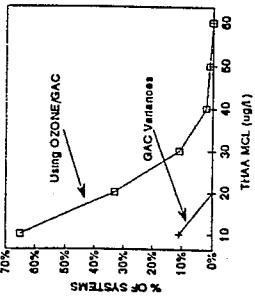
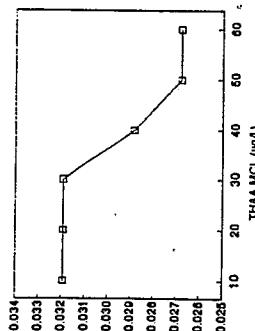
Titr. #4

Titr. #5

Titr. #6



<sup>1</sup> percent of systems installing each treatment tier (includes 20% over-design factor)  
<sup>2</sup> cumulative percent of systems able to meet MCL at each treatment tier (includes 20% over-design factor)  
<sup>3</sup> mean concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL  
<sup>4</sup> assumes 10% of population exposed at first customer  
<sup>5</sup> estimate for 50th percentile



## Exhibit A-8

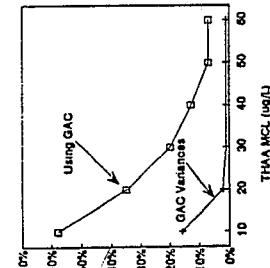
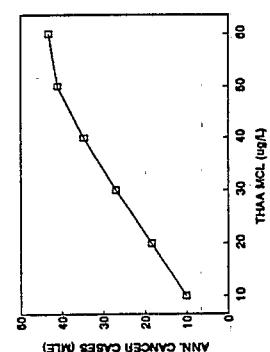
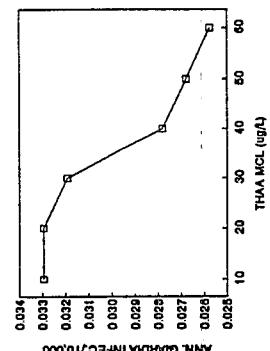
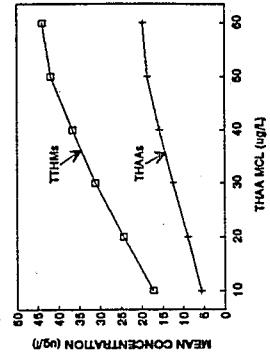
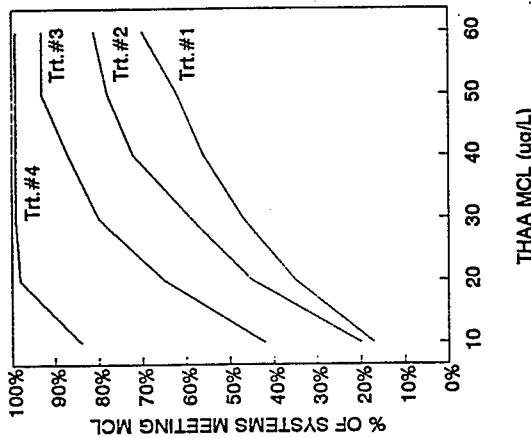
## MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/O ALTERNATIVE DISINFECTION

## Treatment Codes:

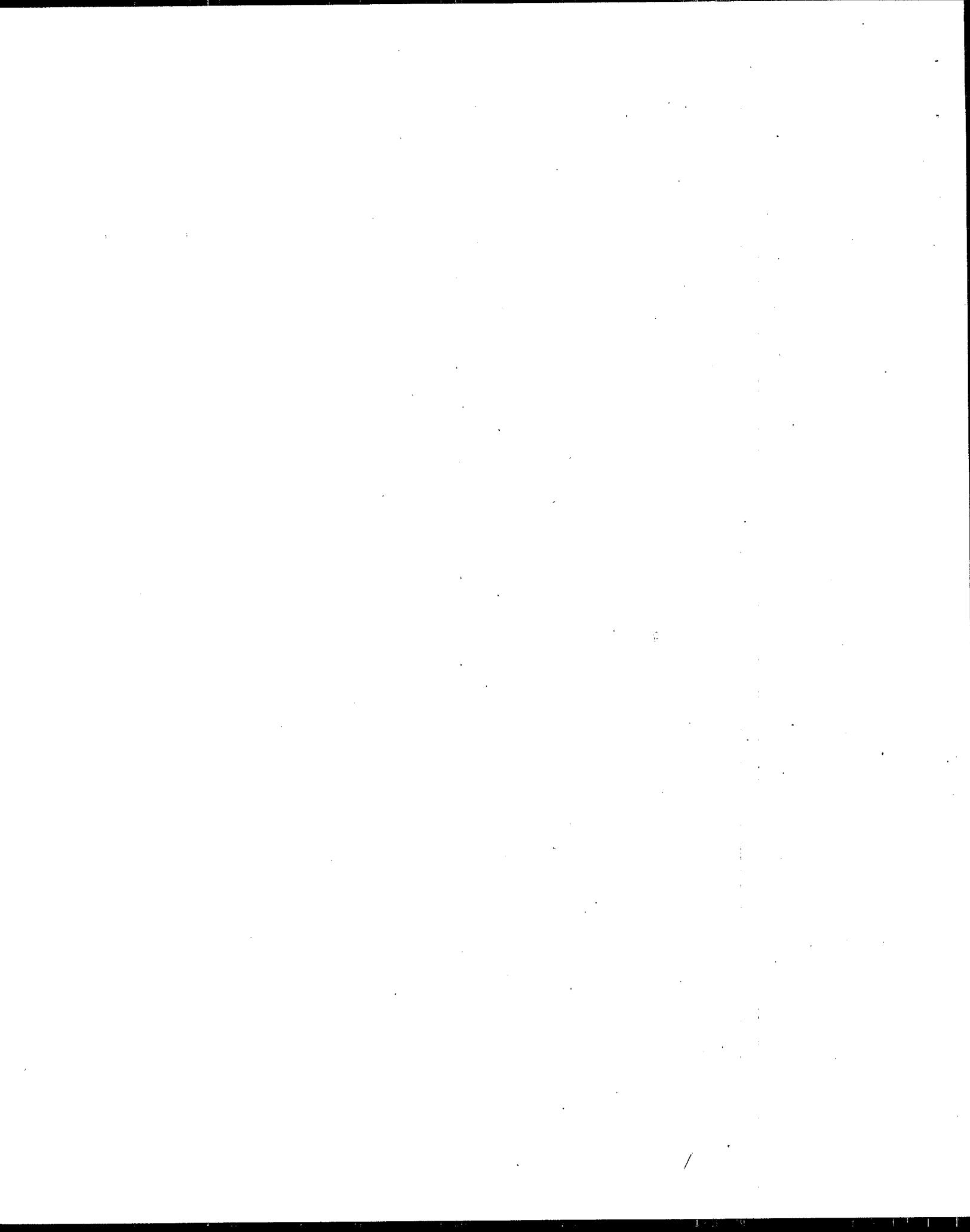
- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlorine + modify alum dose
- 4 – pre-achlor + alum dose + GAC

Population = 103,000,000 (Persons)

| MCL<br>(THAA) | Trt.<br>Code | % of Sys.<br>Ending <sup>1</sup> | Cumulative<br>% Sys.<br>< MCL | Mean Concentrations of<br>By-Products (Avg. O.L.)<br>THMs |     |      | Cancer Incidence |       |      | Glandia Infections<br>(90%) # Yrs. to Outbreak |      |         |
|---------------|--------------|----------------------------------|-------------------------------|-----------------------------------------------------------|-----|------|------------------|-------|------|------------------------------------------------|------|---------|
|               |              |                                  |                               | 95%                                                       | MLE | 95%  | THMs             | MLE   | 95%  | MLE                                            | 95%  |         |
| 60            | 1            | 70                               | 70                            | 57                                                        | 25  | 34.8 | 1.3              | 156.3 | 50.3 | 46.1                                           | 48.1 |         |
| 60            | 2            | 11                               | 81                            | 48                                                        | 21  | 31.2 | 1.2              | 143.2 | 43.5 | 41.3                                           | 42.1 |         |
| 60            | 3            | 12                               | 93                            | 45                                                        | 20  | 29.9 | 1.1              | 135.3 | 42.1 | 25.3                                           | 25.3 |         |
| 60            | 4            | 7                                | 99                            | 44                                                        | 20  | 28.6 | 1.1              | 131.0 |      |                                                |      |         |
| 50            | 1            | 62                               | 62                            | 57                                                        | 25  | 34.8 | 1.3              | 156.3 | 50.3 | 44.8                                           | 46.1 | Trit.#4 |
| 50            | 2            | 16                               | 78                            | 46                                                        | 21  | 30.7 | 1.2              | 139.5 | 44.8 | 41.3                                           | 41.3 | Trit.#3 |
| 50            | 3            | 15                               | 93                            | 43                                                        | 19  | 29.2 | 1.1              | 128.4 | 41.3 | 40.0                                           | 40.0 | Trit.#2 |
| 50            | 4            | 7                                | 99                            | 42                                                        | 10  | 28.2 | 1.1              | 124.5 | 40.0 | 28.8                                           | 28.8 | Trit.#1 |
| 40            | 1            | 56                               | 56                            | 57                                                        | 25  | 34.8 | 1.3              | 156.3 | 50.3 | 43.4                                           | 43.4 |         |
| 40            | 2            | 16                               | 72                            | 44                                                        | 20  | 29.0 | 1.1              | 135.1 | 43.4 | 40.6                                           | 40.6 |         |
| 40            | 3            | 15                               | 87                            | 40                                                        | 18  | 27.3 | 1.0              | 119.2 | 36.3 | 33.9                                           | 33.9 |         |
| 40            | 4            | 13                               | 99                            | 37                                                        | 18  | 25.6 | 0.9              | 105.4 | 33.9 | 27.8                                           | 27.8 |         |
| 30            | 1            | 47                               | 47                            | 57                                                        | 25  | 34.8 | 1.3              | 156.3 | 50.3 | 42.6                                           | 42.6 |         |
| 30            | 2            | 12                               | 59                            | 42                                                        | 19  | 28.0 | 1.0              | 132.5 | 42.6 | 34.1                                           | 34.1 |         |
| 30            | 3            | 21                               | 80                            | 36                                                        | 16  | 25.3 | 0.9              | 106.2 | 34.1 | 31.9                                           | 31.9 |         |
| 30            | 4            | 4                                | 20                            | 60                                                        | 31  | 23.3 | 0.8              | 82.0  | 28.4 |                                                |      |         |
| 20            | 1            | 35                               | 35                            | 57                                                        | 25  | 34.8 | 1.3              | 156.3 | 50.3 | 41.4                                           | 41.4 |         |
| 20            | 2            | 10                               | 45                            | 40                                                        | 19  | 26.6 | 1.0              | 129.0 | 41.4 | 30.5                                           | 30.5 |         |
| 20            | 3            | 20                               | 65                            | 32                                                        | 14  | 22.7 | 0.8              | 95.1  | 30.5 | 27.2                                           | 27.2 |         |
| 20            | 4            | 35                               | 98                            | 24                                                        | 9   | 19.5 | 0.7              | 55.4  | 17.8 | 23.0                                           | 23.0 |         |
| 10            | 1            | 17                               | 17                            | 57                                                        | 25  | 34.8 | 1.3              | 156.3 | 50.3 | 41.0                                           | 41.0 |         |
| 10            | 2            | 3                                | 20                            | 39                                                        | 19  | 28.1 | 1.0              | 127.6 | 41.0 | 34.8                                           | 34.8 |         |
| 10            | 3            | 22                               | 42                            | 28                                                        | 13  | 20.6 | 0.8              | 84.8  | 27.2 | 30.0                                           | 30.0 |         |
| 10            | 4            | 68                               | 84                            | 17                                                        | 6   | 14.6 | 0.5              | 30.0  | 9.6  | 33.0                                           | 33.0 |         |

<sup>1</sup>Percent of systems installing each treatment tier (includes 20% over-design factor)<sup>a</sup>cumulative percent of systems able to meet MCL at each treatment tier (includes 20% over-design factor)<sup>b</sup>mean concentration at each treatment tier (includes 20% over-design factor)<sup>c</sup>assumes 10% of population exposed at first customer<sup>d</sup>estimate for 90th percentile

## **Appendix B**

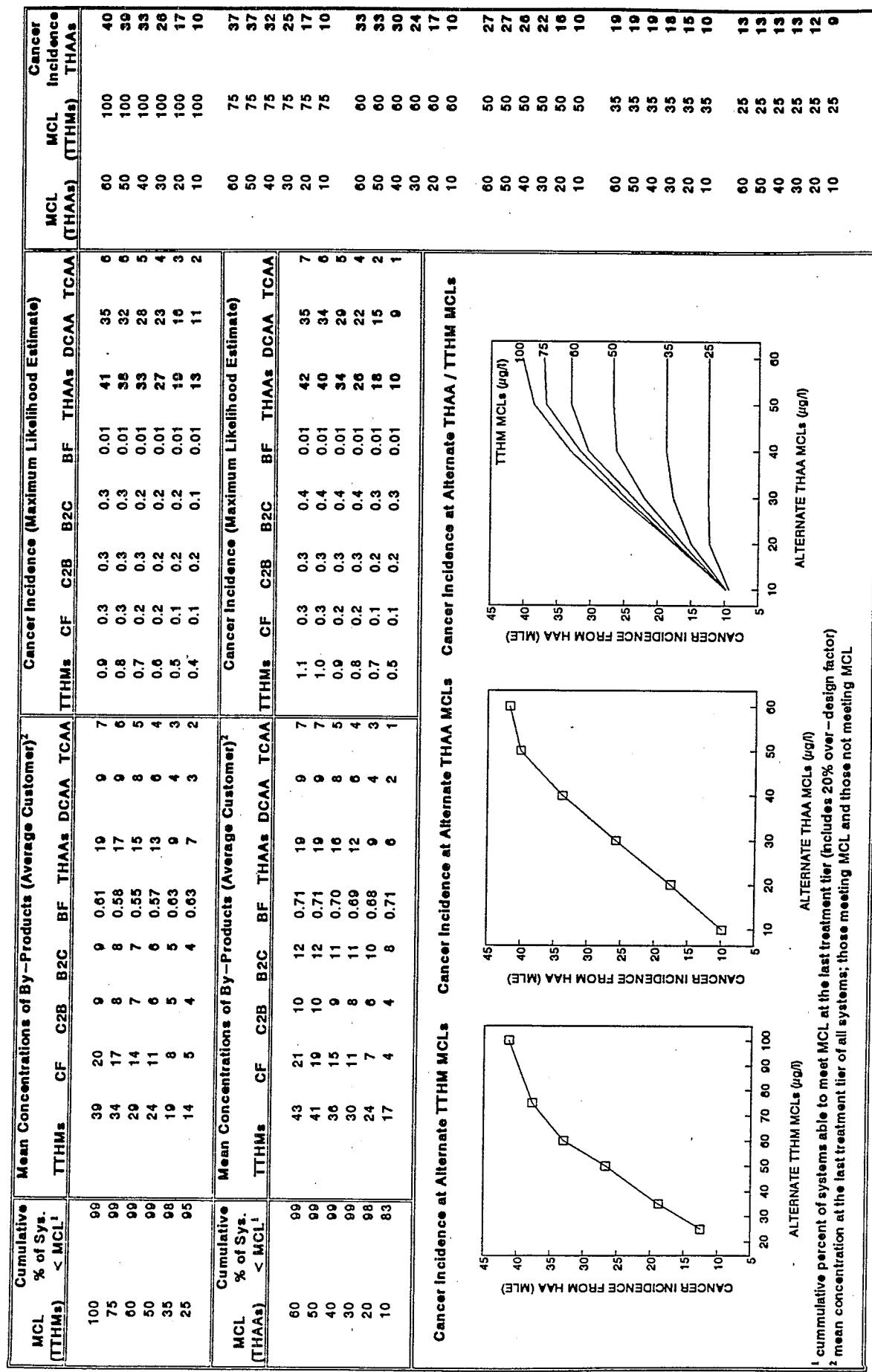


**MODEL OUTPUT (surface w/o softening): SWTR W/O ALTERNATIVE DISINFECTION**

Treatment Code:

- 1 - not requiring further treatment modification
- 2 - eliminate pre-chlorination
- 3 - eliminate pre-chlor + modify alum dose
- 4 - pre-chlor + alum dose + GAC

Population = 103,000,000 (persons)



<sup>1</sup> cumulative percent of systems able to meet MCL at the last treatment tier (includes 20% over-design factor)  
<sup>2</sup> mean concentration at the last treatment tier of all systems; those meeting MCL and those not meeting MCL

**MODEL OUTPUT (surface w/o softening): SWTR W/ ALTERNATIVE DISINFECTION**

**Exhibit B-2**

**Treatment Code:**

- 1 - not requiring further treatment modification
- 2 - eliminate pre-chlorination
- 3 - eliminate pre-chlor + modify alum dose
- 4 - pre-chlor + alum dose + GAC
- 5 - pre-chlor + ammonia + alum + ozone
- 6 - pre-chlor + ammonia + alum + ozone + GAC

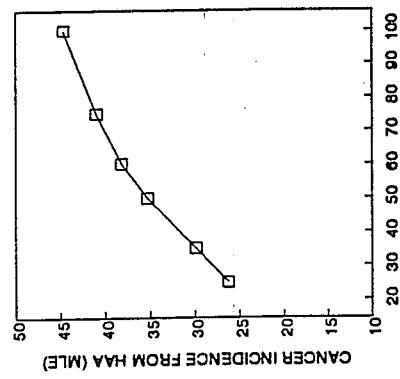
Population = 103,000,000 (persons)

| MCL<br>(TTHMs) | Cumulative<br>% of Sys.<br>< MCL <sup>1</sup> | Mean Concentrations of By-Products (Average Customer) <sup>2</sup> |    |     |     |      |       | Cancer Incidence (Maximum Likelihood Estimate) |      |     |     |     |     |       |      |      |
|----------------|-----------------------------------------------|--------------------------------------------------------------------|----|-----|-----|------|-------|------------------------------------------------|------|-----|-----|-----|-----|-------|------|------|
|                |                                               | TTHMs                                                              | CF | C2B | B2C | BF   | TTHAs | DCAA                                           | TCAA | C2B | CF  | B2C | BF  | TTHAs | DCAA | TCAA |
| 100            | 100                                           | 40                                                                 | 21 | 9   | 9   | 0.60 | 20    | 10                                             | 8    | 0.9 | 0.3 | 0.3 | 0.3 | 0.01  | 45   | 38   |
| 75             | 100                                           | 33                                                                 | 18 | 8   | 8   | 0.55 | 19    | 9                                              | 7    | 0.8 | 0.3 | 0.3 | 0.3 | 0.01  | 41   | 35   |
| 60             | 100                                           | 29                                                                 | 15 | 7   | 6   | 0.50 | 17    | 9                                              | 6    | 0.7 | 0.2 | 0.2 | 0.2 | 0.01  | 38   | 33   |
| 50             | 100                                           | 25                                                                 | 13 | 6   | 6   | 0.46 | 16    | 8                                              | 5    | 0.6 | 0.2 | 0.2 | 0.2 | 0.01  | 35   | 30   |
| 35             | 100                                           | 19                                                                 | 9  | 5   | 5   | 0.42 | 14    | 7                                              | 4    | 0.5 | 0.1 | 0.2 | 0.2 | 0.01  | 30   | 26   |
| 25             | 100                                           | 15                                                                 | 7  | 4   | 4   | 0.34 | 12    | 6                                              | 4    | 0.4 | 0.1 | 0.1 | 0.1 | 0.01  | 26   | 23   |

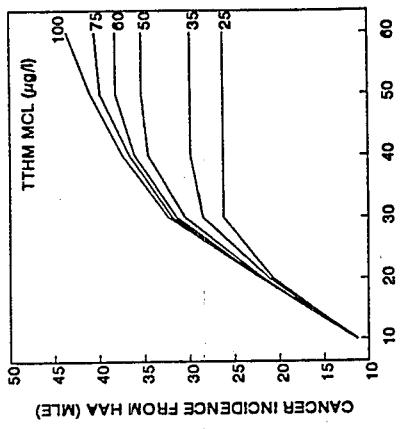
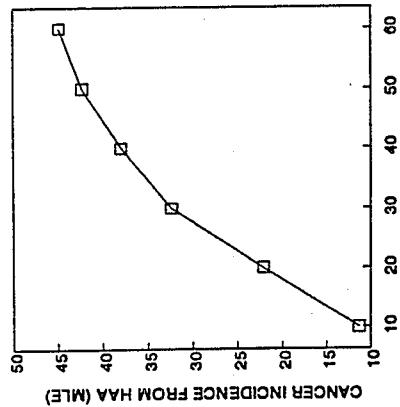
  

| MCL<br>(TTHMs) | Cumulative<br>% of Sys.<br>< MCL <sup>1</sup> | Mean Concentrations of By-Products (Average Customer) <sup>2</sup> |    |     |     |      |       | Cancer Incidence (Maximum Likelihood Estimate) |      |     |     |     |     |       |      |      |
|----------------|-----------------------------------------------|--------------------------------------------------------------------|----|-----|-----|------|-------|------------------------------------------------|------|-----|-----|-----|-----|-------|------|------|
|                |                                               | TTHMs                                                              | CF | C2B | B2C | BF   | TTHAs | DCAA                                           | TCAA | C2B | CF  | B2C | BF  | TTHAs | DCAA | TCAA |
| 60             | 100                                           | 43                                                                 | 22 | 10  | 11  | 0.69 | 21    | 10                                             | 8    | 1.1 | 0.3 | 0.3 | 0.4 | 0.01  | 45   | 38   |
| 50             | 100                                           | 41                                                                 | 19 | 9   | 11  | 0.68 | 20    | 10                                             | 7    | 1.0 | 0.3 | 0.3 | 0.4 | 0.01  | 42   | 36   |
| 40             | 100                                           | 36                                                                 | 16 | 9   | 11  | 0.66 | 17    | 9                                              | 6    | 0.9 | 0.2 | 0.3 | 0.4 | 0.01  | 38   | 33   |
| 30             | 100                                           | 29                                                                 | 11 | 7   | 10  | 0.63 | 15    | 8                                              | 5    | 0.8 | 0.2 | 0.3 | 0.4 | 0.01  | 32   | 28   |
| 20             | 100                                           | 20                                                                 | 6  | 5   | 9   | 0.57 | 10    | 5                                              | 3    | 0.6 | 0.1 | 0.2 | 0.3 | 0.01  | 22   | 20   |
| 10             | 80                                            | 12                                                                 | 2  | 2   | 7   | 0.49 | 6     | 3                                              | 1    | 0.4 | 0.0 | 0.1 | 0.2 | 0.01  | 11   | 10   |

**Cancer Incidence at Alternate TTHM MCLs      Cancer Incidence at Alternate THAA MCLs      Cancer Incidence at Alternate THAA / TTHM MCLs**



<sup>1</sup> cumulative percent of systems able to meet MCL at the last treatment tier (includes 20% over-design factor)  
<sup>2</sup> mean concentration at the last treatment tier of all systems; those meeting MCL and those not meeting MCL



ALTERNATE TTHM MCLs (µg/l)      ALTERNATE THAA MCLs (µg/l)      CANCER INCIDENCE FROM HAA (MLE)

ALTERNATE TTHM MCLs (µg/l)      ALTERNATE THAA MCLs (µg/l)      CANCER INCIDENCE FROM HAA (MLE)

<sup>1</sup> cumulative percent of systems able to meet MCL at the last treatment tier (includes 20% over-design factor)  
<sup>2</sup> mean concentration at the last treatment tier of all systems; those meeting MCL and those not meeting MCL

ALTERNATE TTHM MCLs (µg/l)      ALTERNATE THAA MCLs (µg/l)      CANCER INCIDENCE FROM HAA (MLE)

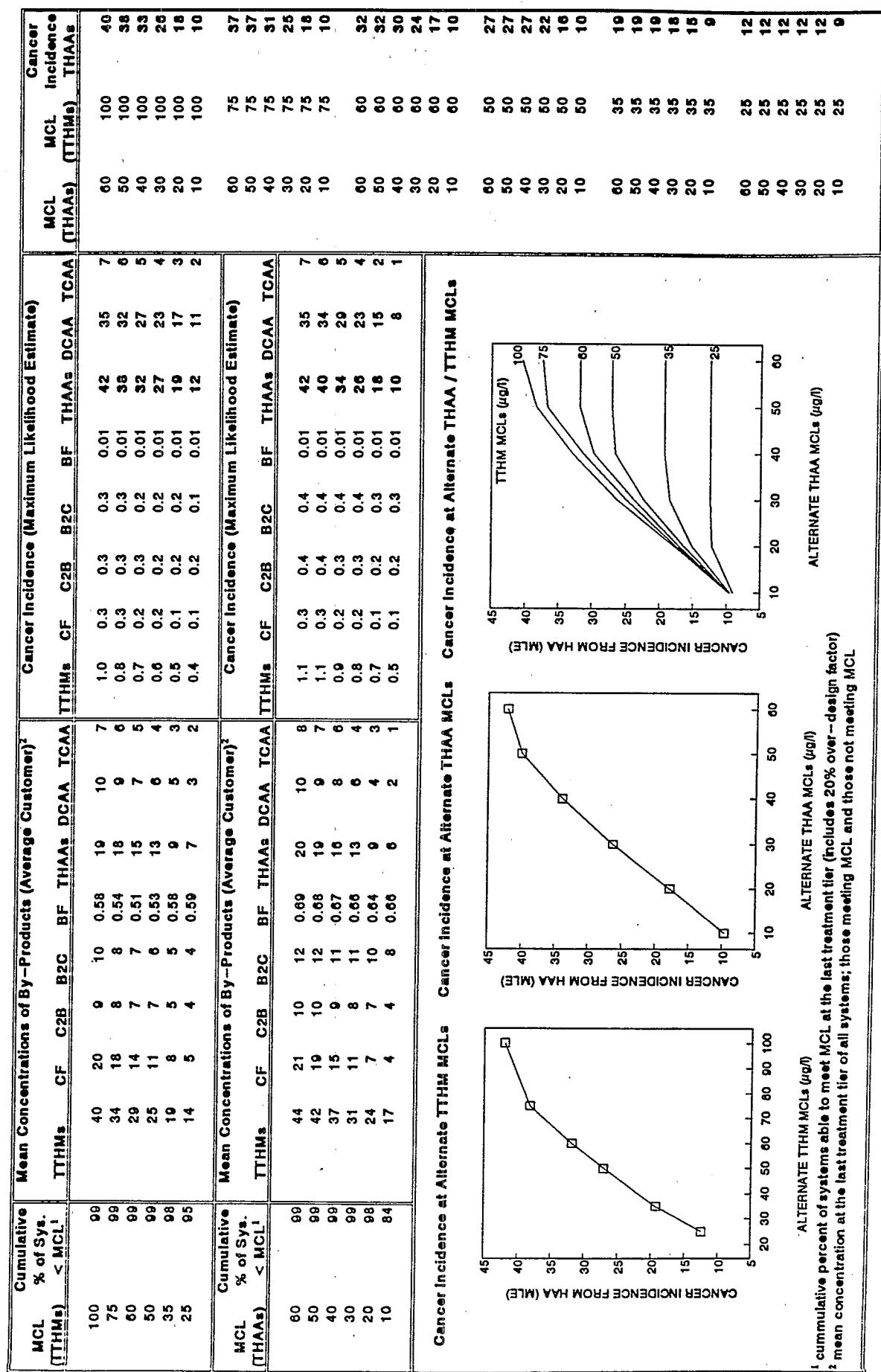
## Exhibit B-3

## MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/O ALTERNATIVE DISINFECTION

## Treatment Code:

- 1 - not requiring further treatment modification
- 2 - eliminate pre-chlorination
- 3 - eliminate pre-chlor + modify alum dose
- 4 - pre-chlor + alum dose + GAC

Population = 103,000,000 (persons)



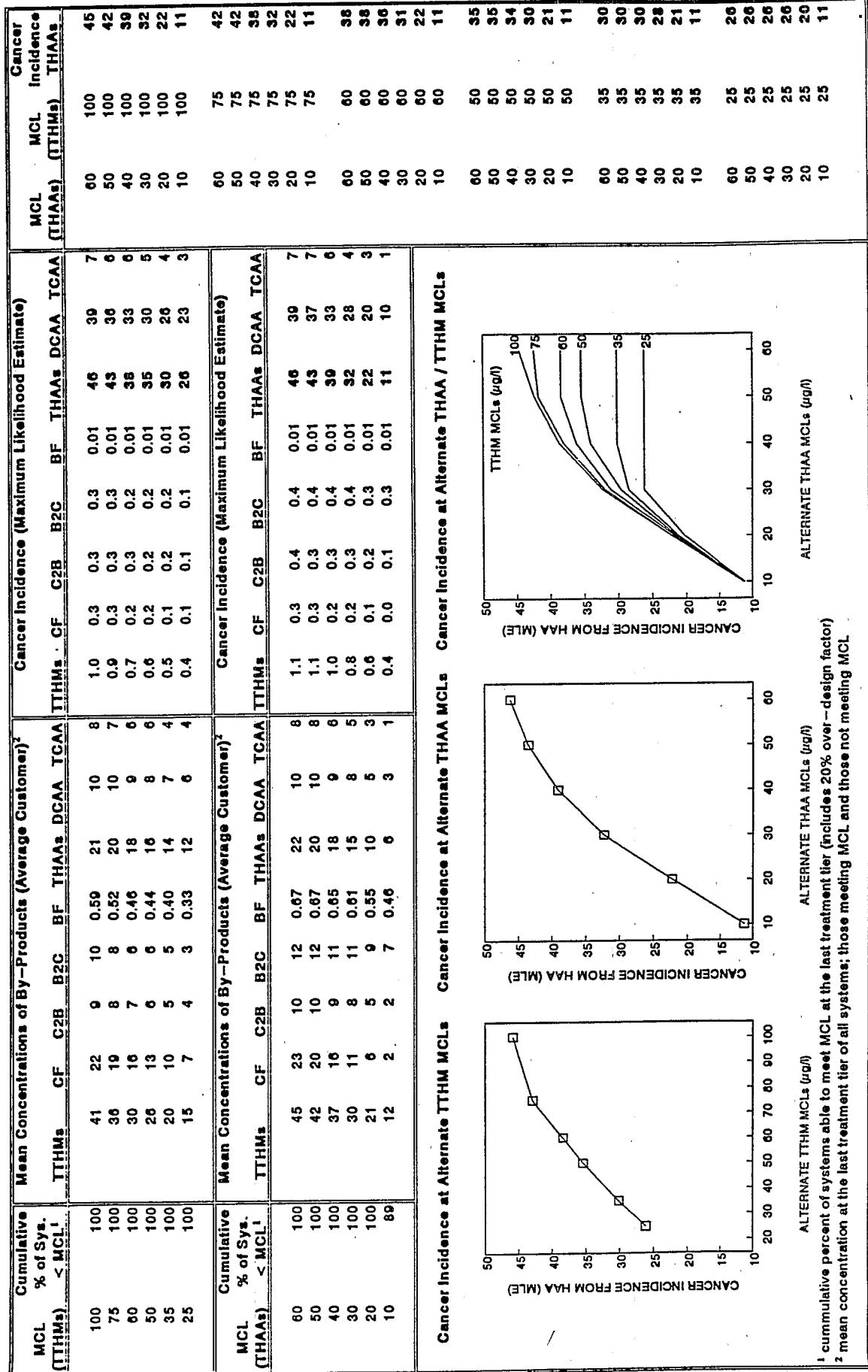
## Exhibit B-4

## MODEL OUTPUT (surface w/o softening): ENHANCED SWTR W/ ALTERNATIVE DISINFECTION

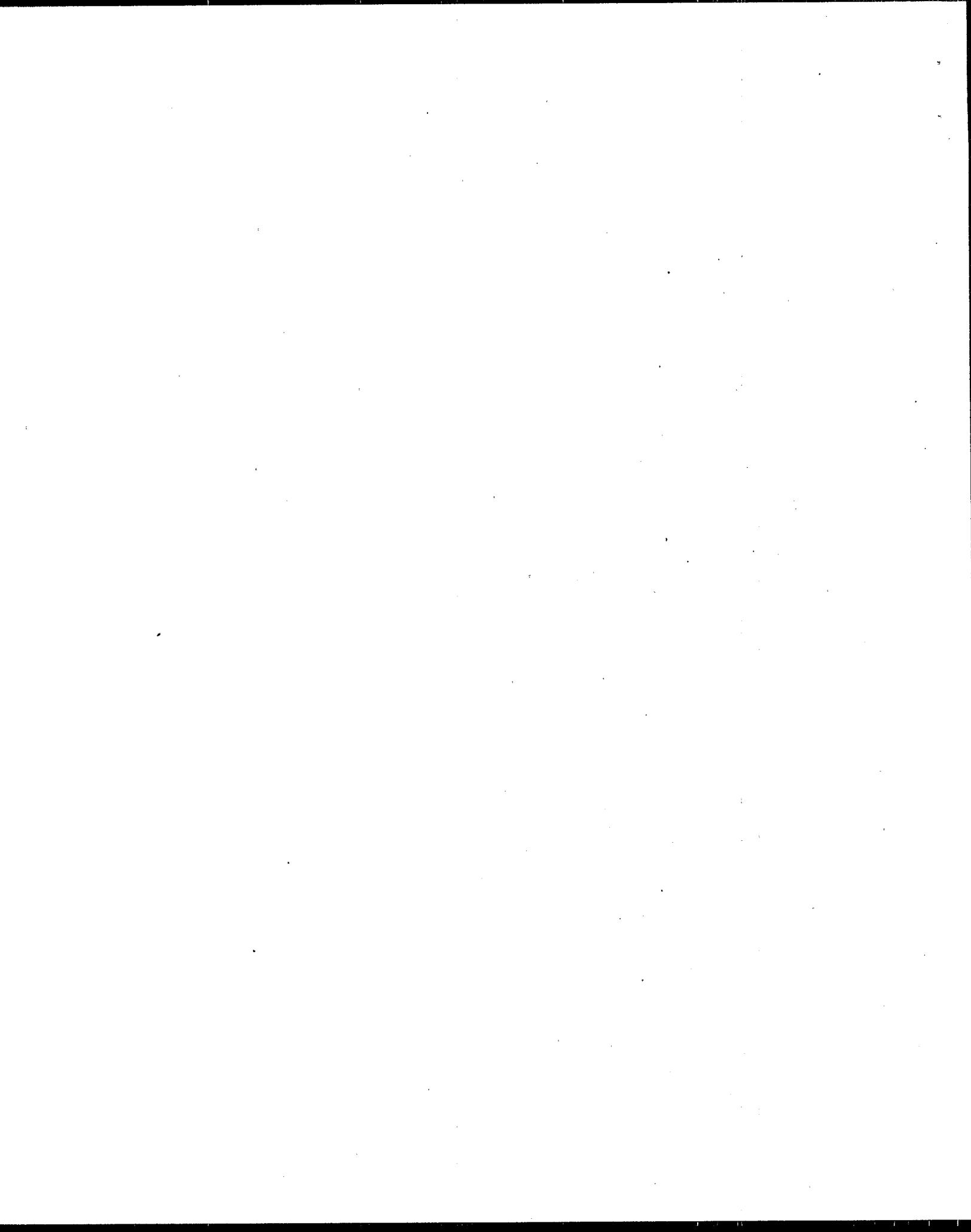
## Treatment Code:

- 1 - not requiring further treatment modification
- 2 - eliminate pre-chlorination
- 3 - eliminate pre-chlor + modify alum dose
- 4 - pre-chlor + alum dose + GAC
- 5 - pre-chlor + ammonia + alum + ozone
- 6 - pre-chlor + ammonia + alum + ozone + GAC

Population = 103,000,000 (persons)



## **Appendix C**



## Concentrations of Individual THMs and HAAs at Alternate TTHM MCLs

Treatment Group Code:

- 1 – SWTR w/o Alternative Disinfection
- 2 – SWTR w/ Alternative Disinfection
- 3 – ENHANCED SWTR w/o Alternative Disinfection
- 4 – ENHANCED SWTR w/ Alternative Disinfection

| Group Code | MCL (TTHMs) | TTHMs |        |      | Chloroform |        |      | Bromodichloromethane |        |      | Dibromo-chloromethane |        |      | THAAs |        |      | Average Customer* |        |      | DCAA |        |      | TCAA |        |      |    |
|------------|-------------|-------|--------|------|------------|--------|------|----------------------|--------|------|-----------------------|--------|------|-------|--------|------|-------------------|--------|------|------|--------|------|------|--------|------|----|
|            |             | mean  | median | 95th | mean       | median | 95th | mean                 | median | 95th | mean                  | median | 95th | mean  | median | 95th | mean              | median | 95th | mean | median | 95th | mean | median | 95th |    |
| 1          | 100         | 39    | 39     | 78   | 20         | 14     | 55   | 9                    | 8      | 22   | 9                     | 3      | 44   | 0.6   | 0.3    | 2    | 19                | 17     | 44   | 9    | 8      | 24   | 7    | 7      | 5    | 20 |
| 1          | 75          | 34    | 36     | 56   | 17         | 13     | 44   | 8                    | 7      | 18   | 8                     | 3      | 35   | 0.6   | 0.3    | 2    | 17                | 14     | 39   | 9    | 7      | 20   | 6    | 5      | 5    | 17 |
| 1          | 60          | 29    | 30     | 46   | 14         | 11     | 38   | 7                    | 7      | 16   | 7                     | 3      | 31   | 0.6   | 0.3    | 2    | 15                | 12     | 35   | 8    | 6      | 19   | 5    | 4      | 4    | 14 |
| 1          | 50          | 24    | 24     | 39   | 11         | 9      | 28   | 6                    | 6      | 13   | 6                     | 3      | 26   | 0.6   | 0.4    | 2    | 13                | 11     | 28   | 6    | 5      | 16   | 4    | 3      | 3    | 11 |
| 1          | 35          | 19    | 18     | 27   | 8          | 7      | 21   | 5                    | 5      | 10   | 5                     | 3      | 18   | 0.6   | 0.4    | 2    | 9                 | 9      | 20   | 4    | 4      | 11   | 3    | 3      | 3    | 7  |
| 1          | 25          | 14    | 14     | 20   | 5          | 4      | 14   | 4                    | 4      | 8    | 4                     | 2      | 12   | 0.6   | 0.4    | 2    | 7                 | 6      | 15   | 3    | 3      | 8    | 2    | 1      | 1    | 5  |
| 2          | 100         | 40    | 39     | 78   | 21         | 16     | 57   | 9                    | 7      | 22   | 9                     | 3      | 48   | 0.6   | 0.3    | 2    | 20                | 18     | 45   | 10   | 10     | 24   | 8    | 6      | 6    | 20 |
| 2          | 75          | 33    | 34     | 56   | 18         | 15     | 46   | 8                    | 7      | 16   | 8                     | 3      | 36   | 0.6   | 0.3    | 2    | 19                | 17     | 39   | 9    | 9      | 20   | 7    | 6      | 6    | 17 |
| 2          | 60          | 29    | 29     | 46   | 15         | 13     | 35   | 7                    | 7      | 16   | 6                     | 2      | 25   | 0.5   | 0.3    | 2    | 17                | 17     | 35   | 9    | 9      | 18   | 6    | 5      | 5    | 14 |
| 2          | 50          | 25    | 25     | 39   | 13         | 12     | 31   | 6                    | 5      | 13   | 6                     | 2      | 21   | 0.5   | 0.2    | 2    | 16                | 17     | 31   | 8    | 9      | 16   | 5    | 5      | 5    | 12 |
| 2          | 35          | 19    | 20     | 27   | 9          | 9      | 22   | 5                    | 4      | 9    | 5                     | 2      | 19   | 0.4   | 0.2    | 2    | 14                | 14     | 26   | 7    | 7      | 14   | 4    | 5      | 5    | 10 |
| 2          | 25          | 15    | 15     | 20   | 7          | 7      | 15   | 4                    | 4      | 7    | 4                     | 1      | 13   | 0.3   | 0.2    | 1    | 12                | 12     | 21   | 6    | 6      | 12   | 4    | 3      | 3    | 7  |
| 3          | 100         | 40    | 39     | 76   | 20         | 18     | 59   | 9                    | 9      | 22   | 10                    | 3      | 47   | 0.6   | 0.3    | 2    | 19                | 17     | 45   | 10   | 8      | 24   | 7    | 5      | 5    | 21 |
| 3          | 75          | 34    | 36     | 57   | 18         | 13     | 46   | 8                    | 8      | 18   | 8                     | 3      | 33   | 0.5   | 0.3    | 2    | 18                | 14     | 40   | 9    | 7      | 20   | 6    | 5      | 5    | 17 |
| 3          | 60          | 29    | 27     | 45   | 14         | 11     | 37   | 7                    | 7      | 15   | 7                     | 3      | 23   | 0.5   | 0.3    | 2    | 15                | 12     | 33   | 7    | 6      | 17   | 5    | 4      | 4    | 14 |
| 3          | 50          | 25    | 24     | 39   | 11         | 10     | 29   | 7                    | 6      | 14   | 6                     | 3      | 23   | 0.5   | 0.3    | 2    | 13                | 11     | 30   | 6    | 5      | 17   | 4    | 4      | 4    | 11 |
| 3          | 35          | 19    | 18     | 28   | 8          | 7      | 20   | 5                    | 5      | 10   | 5                     | 2      | 15   | 0.6   | 0.4    | 2    | 9                 | 9      | 21   | 5    | 4      | 11   | 3    | 3      | 3    | 7  |
| 3          | 25          | 14    | 13     | 20   | 5          | 4      | 14   | 4                    | 4      | 8    | 4                     | 2      | 12   | 0.6   | 0.4    | 2    | 7                 | 6      | 15   | 3    | 3      | 8    | 2    | 1      | 1    | 5  |
| 4          | 100         | 41    | 41     | 75   | 22         | 17     | 59   | 9                    | 8      | 21   | 10                    | 2      | 51   | 0.6   | 0.3    | 2    | 21                | 19     | 45   | 10   | 10     | 24   | 8    | 7      | 7    | 21 |
| 4          | 75          | 36    | 37     | 57   | 19         | 17     | 46   | 8                    | 8      | 19   | 8                     | 2      | 31   | 0.5   | 0.3    | 2    | 20                | 19     | 39   | 10   | 10     | 20   | 7    | 7      | 7    | 16 |
| 4          | 60          | 30    | 30     | 45   | 16         | 14     | 36   | 7                    | 7      | 16   | 6                     | 2      | 23   | 0.5   | 0.3    | 2    | 18                | 18     | 34   | 9    | 10     | 17   | 6    | 6      | 6    | 14 |
| 4          | 50          | 26    | 26     | 39   | 13         | 12     | 32   | 6                    | 6      | 13   | 6                     | 2      | 22   | 0.4   | 0.2    | 2    | 16                | 15     | 32   | 8    | 7      | 17   | 6    | 5      | 5    | 13 |
| 4          | 35          | 20    | 20     | 27   | 10         | 9      | 22   | 5                    | 5      | 10   | 5                     | 2      | 19   | 0.4   | 0.2    | 2    | 14                | 13     | 28   | 7    | 7      | 14   | 4    | 4      | 4    | 10 |
| 4          | 25          | 15    | 15     | 19   | 7          | 7      | 15   | 4                    | 4      | 8    | 3                     | 1      | 13   | 0.3   | 0.2    | 1    | 12                | 12     | 21   | 6    | 6      | 12   | 4    | 3      | 3    | 7  |

\* concentration at the last treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-2

# Concentrations of Individual THMs and HAAs at Alternate TTTHM MCLs — SWTR w/o Alternate Disinfection —

**Treatment Code:** w/o Alternate Disinfection

- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminates pre-chlorine + modify alum dose
- 4 – pre-chlor + alum dose + GAC

| MCL<br>(TTTHMs) | Trt.<br>Code | Concentrations of By-Products [µg/L] (Average Customer)* |        |      |           |        |      | DCAA  |        |      |      |        |      | TCAA |        |      |      |        |      |
|-----------------|--------------|----------------------------------------------------------|--------|------|-----------|--------|------|-------|--------|------|------|--------|------|------|--------|------|------|--------|------|
|                 |              | Bromodichloromethane                                     |        |      | Bromoform |        |      | THAAs |        |      | DCAA |        |      | TCAA |        |      |      |        |      |
|                 |              | mean                                                     | median | 95th | mean      | median | 95th | mean  | median | 95th | mean | median | 95th | mean | median | 95th | mean | median | 95th |
| 100             | 1            | 55                                                       | 46     | 173  | 30        | 16     | 113  | 11    | 9      | 31   | 13   | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 100             | 2            | 42                                                       | 41     | 78   | 21        | 15     | 58   | 9     | 9      | 23   | 11   | 3      | 53   | 0.7  | 0.4    | 2    | 20   | 17     | 46   |
| 100             | 3            | 40                                                       | 41     | 78   | 20        | 15     | 55   | 9     | 9      | 22   | 10   | 3      | 44   | 0.6  | 0.3    | 2    | 20   | 17     | 44   |
| 100             | 4            | 39                                                       | 39     | 78   | 20        | 14     | 55   | 6     | 6      | 22   | 9    | 3      | 44   | 0.6  | 0.3    | 2    | 19   | 17     | 44   |
| 75              | 1            | 55                                                       | 46     | 173  | 30        | 16     | 113  | 11    | 9      | 31   | 13   | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 75              | 2            | 39                                                       | 39     | 78   | 20        | 14     | 51   | 9     | 8      | 22   | 10   | 3      | 39   | 0.6  | 0.3    | 2    | 19   | 17     | 44   |
| 75              | 3            | 35                                                       | 37     | 58   | 18        | 14     | 44   | 8     | 8      | 19   | 8    | 3      | 35   | 0.6  | 0.3    | 2    | 18   | 17     | 39   |
| 75              | 4            | 34                                                       | 36     | 56   | 17        | 13     | 44   | 8     | 7      | 18   | 8    | 3      | 35   | 0.6  | 0.3    | 2    | 17   | 14     | 39   |
| 60              | 1            | 55                                                       | 46     | 173  | 30        | 16     | 113  | 11    | 9      | 31   | 13   | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 60              | 2            | 38                                                       | 37     | 78   | 19        | 13     | 51   | 9     | 8      | 22   | 9    | 3      | 39   | 0.6  | 0.3    | 2    | 19   | 17     | 44   |
| 60              | 3            | 32                                                       | 33     | 48   | 16        | 12     | 44   | 8     | 7      | 16   | 8    | 3      | 32   | 0.5  | 0.3    | 2    | 17   | 14     | 36   |
| 60              | 4            | 29                                                       | 30     | 46   | 14        | 11     | 38   | 7     | 7      | 16   | 7    | 3      | 31   | 0.6  | 0.3    | 2    | 15   | 12     | 35   |
| 50              | 1            | 55                                                       | 46     | 173  | 30        | 16     | 113  | 11    | 9      | 31   | 13   | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 50              | 2            | 37                                                       | 34     | 78   | 18        | 13     | 51   | 9     | 8      | 22   | 9    | 3      | 39   | 0.6  | 0.3    | 2    | 18   | 15     | 44   |
| 50              | 3            | 29                                                       | 27     | 48   | 14        | 11     | 35   | 7     | 7      | 16   | 7    | 3      | 31   | 0.5  | 0.3    | 2    | 15   | 12     | 34   |
| 50              | 4            | 24                                                       | 24     | 39   | 11        | 9      | 28   | 6     | 6      | 13   | 6    | 3      | 28   | 0.6  | 0.4    | 2    | 13   | 11     | 28   |
| 35              | 1            | 55                                                       | 46     | 173  | 30        | 16     | 113  | 11    | 9      | 31   | 13   | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 35              | 2            | 37                                                       | 32     | 78   | 18        | 13     | 51   | 9     | 8      | 22   | 9    | 3      | 39   | 0.6  | 0.3    | 2    | 18   | 15     | 44   |
| 35              | 3            | 27                                                       | 25     | 48   | 13        | 11     | 35   | 7     | 6      | 15   | 7    | 3      | 31   | 0.5  | 0.3    | 2    | 14   | 12     | 33   |
| 35              | 4            | 19                                                       | 18     | 27   | 8         | 7      | 21   | 5     | 5      | 10   | 5    | 3      | 18   | 0.6  | 0.4    | 2    | 9    | 7      | 20   |
| 25              | 1            | 55                                                       | 46     | 173  | 30        | 16     | 113  | 11    | 9      | 31   | 13   | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 25              | 2            | 36                                                       | 32     | 78   | 18        | 13     | 51   | 9     | 7      | 22   | 9    | 3      | 39   | 0.5  | 0.3    | 2    | 18   | 14     | 44   |
| 25              | 3            | 26                                                       | 23     | 48   | 12        | 10     | 35   | 7     | 6      | 15   | 7    | 3      | 31   | 0.5  | 0.2    | 2    | 13   | 12     | 33   |
| 25              | 4            | 14                                                       | 14     | 20   | 5         | 4      | 14   | 4     | 4      | 12   | 4    | 4      | 12   | 0.6  | 0.4    | 2    | 7    | 6      | 15   |

\* concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-3

**Concentrations of Individual THMs and HAAs at Alternate TTHM MCLs  
— SWTR w/ Alternate Disinfection —**

## Treatment Code: w/ Alternate Disinfection

- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + add ammonia
- 4 – pre-chlor + ammonia + alum dose
- 5 – pre-chlor + ammonia + alum dose + ozone
- 6 – pre-chlor + ammonia + alum dose + ozone + GAC

| MCL<br>(TTHMs) | Tit<br>Code | Concentrations of By-Products (µg/L) (Average Customer)* |        |      |           |        |      |       |        |      |        |        |      |     |     |   |    |    |    |    |    |    |    |   |    |
|----------------|-------------|----------------------------------------------------------|--------|------|-----------|--------|------|-------|--------|------|--------|--------|------|-----|-----|---|----|----|----|----|----|----|----|---|----|
|                |             | Bromodichloromethane                                     |        |      |           |        |      | THAAs |        |      |        |        |      |     |     |   |    |    |    |    |    |    |    |   |    |
|                |             | Chloroform                                               |        |      | Bromoform |        |      | mean  |        |      | median |        |      |     |     |   |    |    |    |    |    |    |    |   |    |
|                |             | mean                                                     | median | 95th | mean      | median | 95th | mean  | median | 95th | mean   | median | 95th |     |     |   |    |    |    |    |    |    |    |   |    |
| 100            | 1           | 55                                                       | 46     | 173  | 30        | 18     | 113  | 11    | 9      | 31   | 13     | 4      | 72   | 0.8 | 0.4 | 3 | 24 | 17 | 80 | 11 | 8  | 31 | 11 | 6 | 38 |
| 100            | 2           | 42                                                       | 41     | 78   | 21        | 15     | 58   | 9     | 9      | 23   | 11     | 3      | 53   | 0.7 | 0.4 | 2 | 20 | 17 | 48 | 10 | 9  | 24 | 8  | 6 | 21 |
| 100            | 3           | 40                                                       | 39     | 78   | 21        | 16     | 57   | 9     | 7      | 22   | 9      | 3      | 48   | 0.6 | 0.3 | 2 | 20 | 18 | 45 | 10 | 10 | 24 | 8  | 6 | 20 |
| 100            | 4           | 40                                                       | 39     | 78   | 21        | 16     | 57   | 9     | 7      | 22   | 9      | 3      | 48   | 0.6 | 0.3 | 2 | 20 | 18 | 45 | 10 | 10 | 24 | 8  | 6 | 20 |
| 100            | 5           | 40                                                       | 39     | 78   | 21        | 16     | 57   | 9     | 7      | 22   | 9      | 3      | 48   | 0.6 | 0.3 | 2 | 20 | 18 | 45 | 10 | 10 | 24 | 8  | 6 | 20 |
| 100            | 6           | 40                                                       | 39     | 78   | 21        | 16     | 57   | 9     | 7      | 22   | 9      | 3      | 48   | 0.6 | 0.3 | 2 | 20 | 18 | 45 | 10 | 10 | 24 | 8  | 6 | 20 |
| 75             | 1           | 55                                                       | 46     | 173  | 30        | 18     | 113  | 11    | 9      | 31   | 13     | 4      | 72   | 0.8 | 0.4 | 3 | 24 | 17 | 80 | 11 | 8  | 31 | 11 | 6 | 38 |
| 75             | 2           | 39                                                       | 39     | 78   | 20        | 14     | 51   | 9     | 8      | 22   | 10     | 3      | 39   | 0.6 | 0.3 | 2 | 18 | 17 | 44 | 10 | 8  | 24 | 7  | 5 | 19 |
| 75             | 3           | 34                                                       | 35     | 59   | 18        | 15     | 48   | 8     | 7      | 16   | 8      | 3      | 36   | 0.6 | 0.3 | 2 | 19 | 17 | 41 | 10 | 9  | 20 | 7  | 6 | 18 |
| 75             | 4           | 33                                                       | 34     | 56   | 18        | 15     | 46   | 8     | 7      | 16   | 8      | 3      | 36   | 0.6 | 0.3 | 2 | 19 | 17 | 39 | 9  | 9  | 20 | 7  | 6 | 17 |
| 75             | 5           | 33                                                       | 34     | 56   | 18        | 15     | 46   | 8     | 7      | 16   | 8      | 3      | 36   | 0.6 | 0.3 | 2 | 19 | 17 | 39 | 9  | 9  | 20 | 7  | 6 | 17 |
| 75             | 6           | 33                                                       | 34     | 56   | 18        | 15     | 46   | 8     | 7      | 16   | 8      | 3      | 36   | 0.6 | 0.3 | 2 | 19 | 17 | 39 | 9  | 9  | 20 | 7  | 6 | 17 |
| 60             | 1           | 55                                                       | 46     | 173  | 30        | 18     | 113  | 11    | 9      | 31   | 13     | 4      | 72   | 0.8 | 0.4 | 3 | 24 | 17 | 80 | 11 | 8  | 31 | 11 | 6 | 38 |
| 60             | 2           | 38                                                       | 37     | 78   | 19        | 13     | 51   | 9     | 8      | 22   | 9      | 3      | 39   | 0.6 | 0.3 | 2 | 19 | 17 | 44 | 10 | 8  | 24 | 7  | 5 | 19 |
| 60             | 3           | 31                                                       | 30     | 52   | 17        | 13     | 46   | 7     | 7      | 16   | 7      | 2      | 26   | 0.5 | 0.3 | 2 | 18 | 17 | 38 | 9  | 9  | 20 | 6  | 5 | 14 |
| 60             | 4           | 29                                                       | 29     | 46   | 15        | 13     | 37   | 7     | 7      | 16   | 6      | 2      | 25   | 0.5 | 0.3 | 2 | 18 | 17 | 35 | 9  | 9  | 18 | 6  | 5 | 14 |
| 60             | 5           | 29                                                       | 29     | 46   | 15        | 13     | 35   | 7     | 7      | 16   | 6      | 2      | 25   | 0.5 | 0.3 | 2 | 17 | 17 | 35 | 9  | 9  | 18 | 6  | 5 | 14 |
| 60             | 6           | 29                                                       | 29     | 46   | 15        | 13     | 35   | 7     | 7      | 16   | 6      | 2      | 25   | 0.5 | 0.3 | 2 | 17 | 17 | 35 | 9  | 9  | 18 | 6  | 5 | 14 |
| 50             | 1           | 55                                                       | 48     | 173  | 30        | 18     | 113  | 11    | 9      | 31   | 13     | 4      | 72   | 0.8 | 0.4 | 3 | 24 | 17 | 80 | 11 | 8  | 31 | 11 | 6 | 38 |
| 50             | 2           | 37                                                       | 34     | 78   | 18        | 13     | 51   | 9     | 8      | 22   | 9      | 3      | 39   | 0.6 | 0.3 | 2 | 18 | 15 | 44 | 9  | 8  | 24 | 6  | 5 | 19 |
| 50             | 3           | 28                                                       | 28     | 50   | 15        | 13     | 34   | 7     | 6      | 14   | 6      | 2      | 25   | 0.5 | 0.2 | 2 | 17 | 17 | 35 | 9  | 9  | 19 | 6  | 5 | 14 |
| 50             | 4           | 26                                                       | 25     | 39   | 13        | 12     | 31   | 6     | 5      | 13   | 6      | 2      | 21   | 0.5 | 0.2 | 2 | 16 | 17 | 31 | 8  | 9  | 16 | 5  | 5 | 12 |
| 50             | 5           | 25                                                       | 25     | 39   | 13        | 12     | 31   | 6     | 5      | 13   | 6      | 2      | 21   | 0.5 | 0.2 | 2 | 16 | 17 | 31 | 8  | 9  | 16 | 5  | 5 | 12 |
| 50             | 6           | 25                                                       | 25     | 39   | 13        | 12     | 31   | 6     | 5      | 13   | 6      | 2      | 21   | 0.5 | 0.2 | 2 | 16 | 17 | 31 | 8  | 9  | 16 | 5  | 5 | 12 |
| 35             | 1           | 55                                                       | 46     | 173  | 30        | 18     | 113  | 11    | 9      | 31   | 13     | 4      | 72   | 0.8 | 0.4 | 3 | 24 | 17 | 80 | 11 | 8  | 31 | 11 | 6 | 38 |
| 35             | 2           | 37                                                       | 32     | 78   | 18        | 13     | 51   | 9     | 7      | 22   | 9      | 3      | 39   | 0.6 | 0.3 | 2 | 18 | 15 | 44 | 9  | 8  | 24 | 6  | 5 | 19 |
| 35             | 3           | 25                                                       | 23     | 50   | 13        | 11     | 34   | 6     | 5      | 12   | 6      | 2      | 23   | 0.5 | 0.2 | 2 | 16 | 16 | 35 | 8  | 8  | 17 | 6  | 5 | 14 |
| 35             | 4           | 20                                                       | 20     | 28   | 10        | 9      | 23   | 5     | 4      | 10   | 5      | 2      | 19   | 0.4 | 0.2 | 2 | 14 | 14 | 27 | 7  | 7  | 14 | 5  | 5 | 11 |
| 35             | 5           | 19                                                       | 20     | 27   | 10        | 9      | 23   | 5     | 4      | 9    | 5      | 2      | 19   | 0.4 | 0.2 | 2 | 14 | 14 | 27 | 7  | 7  | 14 | 4  | 4 | 10 |
| 35             | 6           | 19                                                       | 20     | 27   | 9         | 9      | 22   | 5     | 4      | 9    | 5      | 2      | 19   | 0.4 | 0.2 | 2 | 14 | 14 | 26 | 7  | 7  | 14 | 4  | 4 | 10 |
| 25             | 1           | 55                                                       | 46     | 173  | 30        | 18     | 113  | 11    | 9      | 31   | 13     | 4      | 72   | 0.8 | 0.4 | 3 | 24 | 17 | 80 | 11 | 8  | 31 | 11 | 6 | 38 |
| 25             | 2           | 36                                                       | 32     | 78   | 18        | 13     | 51   | 9     | 7      | 22   | 9      | 3      | 39   | 0.5 | 0.3 | 2 | 18 | 14 | 44 | 9  | 8  | 24 | 6  | 5 | 19 |
| 25             | 3           | 23                                                       | 19     | 50   | 12        | 10     | 34   | 5     | 4      | 12   | 5      | 1      | 23   | 0.4 | 0.2 | 2 | 16 | 15 | 35 | 8  | 8  | 17 | 5  | 5 | 14 |
| 25             | 4           | 17                                                       | 16     | 24   | 8         | 7      | 19   | 4     | 4      | 8    | 4      | 1      | 13   | 0.3 | 0.2 | 1 | 13 | 12 | 24 | 7  | 7  | 13 | 4  | 4 | 9  |
| 25             | 5           | 15                                                       | 15     | 20   | 8         | 7      | 15   | 4     | 4      | 8    | 4      | 1      | 13   | 0.3 | 0.2 | 1 | 12 | 12 | 22 | 6  | 7  | 12 | 4  | 4 | 8  |
| 25             | 6           | 15                                                       | 15     | 20   | 7         | 7      | 15   | 4     | 4      | 8    | 4      | 1      | 13   | 0.3 | 0.2 | 1 | 12 | 12 | 21 | 6  | 6  | 12 | 4  | 4 | 8  |

\* Concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-4

# Concentrations of Individual THMs and HAAs at Alternate TTHM MCLs

## — Enhanced SWTR w/o Alternate Disinfection —

Treatment Code: w/o Alternate Disinfection

- 1 — not requiring further treatment modification
- 2 — eliminate pre-chlorination
- 3 — eliminate pre-chlor + modify alum dose
- 4 — pre-chlor + alum dose + GAC

| MCL<br>(TTHMs) | Trt.<br>Code | Concentrations of By-Products (ug/L) (Average Customer)* |        |      |                      |        |      | DCAA  |        |      |           |        |      | TCAA             |        |      |
|----------------|--------------|----------------------------------------------------------|--------|------|----------------------|--------|------|-------|--------|------|-----------|--------|------|------------------|--------|------|
|                |              | Bromodichloromethane                                     |        |      | Dibromochloromethane |        |      | THAAs |        |      | Bromiform |        |      | mean median 95th |        |      |
|                |              | mean                                                     | median | 95th | mean                 | median | 95th | mean  | median | 95th | mean      | median | 95th | mean             | median | 95th |
| 100            | 1            | 57                                                       | 49     | 173  | 31                   | 17     | 114  | 12    | 9      | 31   | 14        | 4      | 72   | 0.7              | 0.4    | 3    |
| 100            | 2            | 44                                                       | 42     | 79   | 22                   | 17     | 60   | 10    | 9      | 28   | 11        | 3      | 55   | 0.6              | 0.4    | 2    |
| 100            | 3            | 41                                                       | 42     | 76   | 21                   | 17     | 59   | 10    | 9      | 22   | 10        | 3      | 47   | 0.6              | 0.3    | 2    |
| 100            | 4            | 40                                                       | 39     | 78   | 20                   | 16     | 59   | 9     | 8      | 22   | 10        | 3      | 47   | 0.6              | 0.3    | 2    |
| 75             | 1            | 57                                                       | 49     | 173  | 31                   | 17     | 114  | 12    | 9      | 31   | 14        | 4      | 72   | 0.7              | 0.4    | 3    |
| 75             | 2            | 41                                                       | 39     | 79   | 21                   | 16     | 51   | 10    | 9      | 23   | 10        | 3      | 41   | 0.6              | 0.3    | 2    |
| 75             | 3            | 36                                                       | 37     | 57   | 18                   | 15     | 46   | 9     | 8      | 19   | 8         | 3      | 33   | 0.5              | 0.3    | 2    |
| 75             | 4            | 34                                                       | 36     | 57   | 18                   | 13     | 46   | 8     | 8      | 18   | 8         | 3      | 33   | 0.5              | 0.3    | 2    |
| 60             | 1            | 57                                                       | 49     | 173  | 31                   | 17     | 114  | 12    | 9      | 31   | 14        | 4      | 72   | 0.7              | 0.4    | 3    |
| 60             | 2            | 39                                                       | 37     | 79   | 20                   | 14     | 51   | 9     | 8      | 23   | 10        | 3      | 41   | 0.6              | 0.3    | 2    |
| 60             | 3            | 32                                                       | 31     | 49   | 16                   | 12     | 41   | 8     | 7      | 16   | 7         | 3      | 30   | 0.5              | 0.3    | 2    |
| 60             | 4            | 29                                                       | 27     | 45   | 14                   | 11     | 37   | 7     | 7      | 15   | 7         | 3      | 23   | 0.5              | 0.3    | 2    |
| 50             | 1            | 57                                                       | 49     | 173  | 31                   | 17     | 114  | 12    | 9      | 31   | 14        | 4      | 72   | 0.7              | 0.4    | 3    |
| 50             | 2            | 39                                                       | 36     | 79   | 19                   | 14     | 51   | 9     | 8      | 23   | 10        | 3      | 41   | 0.6              | 0.3    | 2    |
| 50             | 3            | 30                                                       | 28     | 46   | 15                   | 12     | 40   | 8     | 7      | 16   | 7         | 3      | 30   | 0.5              | 0.3    | 2    |
| 50             | 4            | 25                                                       | 24     | 39   | 11                   | 10     | 29   | 7     | 6      | 14   | 6         | 3      | 23   | 0.5              | 0.3    | 2    |
| 35             | 1            | 57                                                       | 49     | 173  | 31                   | 17     | 114  | 12    | 9      | 31   | 14        | 4      | 72   | 0.7              | 0.4    | 3    |
| 35             | 2            | 38                                                       | 35     | 79   | 19                   | 13     | 51   | 9     | 8      | 23   | 10        | 3      | 41   | 0.6              | 0.3    | 2    |
| 35             | 3            | 28                                                       | 25     | 49   | 13                   | 11     | 40   | 7     | 7      | 15   | 7         | 3      | 30   | 0.5              | 0.3    | 2    |
| 35             | 4            | 19                                                       | 18     | 28   | 8                    | 7      | 20   | 5     | 5      | 10   | 5         | 2      | 15   | 0.6              | 0.4    | 2    |
| 25             | 1            | 57                                                       | 49     | 173  | 31                   | 17     | 114  | 12    | 9      | 31   | 14        | 4      | 72   | 0.7              | 0.4    | 3    |
| 25             | 2            | 37                                                       | 35     | 79   | 19                   | 13     | 51   | 9     | 8      | 23   | 9         | 3      | 41   | 0.5              | 0.3    | 2    |
| 25             | 3            | 28                                                       | 23     | 49   | 12                   | 10     | 40   | 7     | 6      | 15   | 7         | 3      | 30   | 0.4              | 0.2    | 1    |
| 25             | 4            | 14                                                       | 13     | 20   | 5                    | 4      | 14   | 4     | 4      | 14   | 4         | 2      | 12   | 0.6              | 0.4    | 2    |

\* concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-5

# Concentrations of Individual THMs and HAAs at Alternate TTHM MCLs – Enhanced SWTR w/ Alternate Disinfection –

Treatment Code: w/ Alternate Disinfection

- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + add ammonia
- 4 – pre-chlor + ammonia + alum dose
- 5 – pre-chlor + ammonia + alum dose + ozone
- 6 – pre-chlor + ammonia + alum dose + ozone + GAC

| Concentrations of By-Products (µg/L) (Average Customer)* |              |       |        |      |            |        |      |                      |        |      |
|----------------------------------------------------------|--------------|-------|--------|------|------------|--------|------|----------------------|--------|------|
| MCL<br>(TTHMs)                                           | Trt.<br>Code | TTHMs |        |      | Chloroform |        |      | Bromodichloromethane |        |      |
|                                                          |              | mean  | median | 95th | mean       | median | 95th | mean                 | median | 95th |
| 100                                                      | 1            | 57    | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   |
| 100                                                      | 2            | 44    | 42     | 78   | 22         | 17     | 60   | 10                   | 9      | 28   |
| 100                                                      | 3            | 43    | 42     | 78   | 23         | 17     | 62   | 9                    | 8      | 21   |
| 100                                                      | 4            | 41    | 41     | 75   | 22         | 17     | 59   | 9                    | 8      | 21   |
| 100                                                      | 5            | 41    | 41     | 75   | 22         | 17     | 59   | 9                    | 8      | 21   |
| 100                                                      | 6            | 41    | 41     | 75   | 22         | 17     | 59   | 9                    | 8      | 21   |
| 75                                                       | 1            | 57    | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   |
| 75                                                       | 2            | 41    | 39     | 79   | 21         | 16     | 51   | 10                   | 9      | 23   |
| 75                                                       | 3            | 38    | 39     | 60   | 21         | 17     | 48   | 9                    | 8      | 19   |
| 75                                                       | 4            | 36    | 37     | 57   | 19         | 17     | 46   | 9                    | 8      | 19   |
| 75                                                       | 5            | 36    | 37     | 57   | 19         | 17     | 46   | 8                    | 8      | 19   |
| 75                                                       | 6            | 36    | 37     | 57   | 19         | 17     | 46   | 8                    | 8      | 19   |
| 60                                                       | 1            | 57    | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   |
| 60                                                       | 2            | 39    | 37     | 79   | 20         | 14     | 51   | 9                    | 8      | 23   |
| 60                                                       | 3            | 34    | 33     | 58   | 19         | 15     | 46   | 8                    | 7      | 17   |
| 60                                                       | 4            | 30    | 30     | 45   | 16         | 14     | 37   | 7                    | 7      | 16   |
| 60                                                       | 5            | 30    | 30     | 45   | 16         | 14     | 36   | 7                    | 7      | 16   |
| 60                                                       | 6            | 30    | 30     | 45   | 16         | 14     | 36   | 7                    | 7      | 16   |
| 50                                                       | 1            | 57    | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   |
| 50                                                       | 2            | 39    | 36     | 79   | 19         | 14     | 51   | 9                    | 8      | 23   |
| 50                                                       | 3            | 33    | 31     | 58   | 18         | 15     | 45   | 8                    | 7      | 17   |
| 50                                                       | 4            | 27    | 28     | 39   | 14         | 13     | 32   | 7                    | 6      | 14   |
| 50                                                       | 5            | 26    | 26     | 39   | 13         | 12     | 32   | 6                    | 6      | 13   |
| 50                                                       | 6            | 26    | 26     | 39   | 13         | 12     | 32   | 6                    | 6      | 13   |
| 35                                                       | 1            | 57    | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   |
| 35                                                       | 2            | 38    | 35     | 79   | 19         | 13     | 51   | 9                    | 8      | 23   |
| 35                                                       | 3            | 30    | 25     | 58   | 16         | 13     | 45   | 7                    | 6      | 17   |
| 35                                                       | 4            | 22    | 22     | 34   | 11         | 10     | 24   | 6                    | 5      | 10   |
| 35                                                       | 5            | 20    | 20     | 28   | 10         | 9      | 23   | 5                    | 5      | 10   |
| 35                                                       | 6            | 20    | 20     | 27   | 10         | 9      | 22   | 5                    | 5      | 10   |
| 25                                                       | 1            | 57    | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   |
| 25                                                       | 2            | 37    | 35     | 79   | 19         | 13     | 51   | 9                    | 7      | 23   |
| 25                                                       | 3            | 29    | 22     | 58   | 16         | 12     | 45   | 7                    | 6      | 17   |
| 25                                                       | 4            | 19    | 18     | 34   | 9          | 8      | 23   | 5                    | 5      | 10   |
| 25                                                       | 5            | 15    | 15     | 20   | 7          | 7      | 16   | 4                    | 4      | 8    |
| 25                                                       | 6            | 15    | 15     | 19   | 7          | 7      | 15   | 4                    | 4      | 8    |

| Concentrations of By-Products (µg/L) (Average Customer)* |              |       |        |      |            |        |      |                      |        |      |
|----------------------------------------------------------|--------------|-------|--------|------|------------|--------|------|----------------------|--------|------|
| MCL<br>(TTHMs)                                           | Trt.<br>Code | TTHMs |        |      | Chloroform |        |      | Dikromochloromethane |        |      |
|                                                          |              | mean  | median | 95th | mean       | median | 95th | mean                 | median | 95th |
| 100                                                      | 1            | 57    | 49     | 173  | 31         | 14     | 4    | 72                   | 0.7    | 0.4  |
| 100                                                      | 2            | 44    | 42     | 78   | 22         | 17     | 60   | 10                   | 9      | 28   |
| 100                                                      | 3            | 43    | 42     | 78   | 23         | 17     | 62   | 9                    | 8      | 21   |
| 100                                                      | 4            | 41    | 41     | 75   | 22         | 17     | 59   | 9                    | 8      | 21   |
| 100                                                      | 5            | 41    | 41     | 75   | 22         | 17     | 59   | 9                    | 8      | 21   |
| 100                                                      | 6            | 41    | 41     | 75   | 22         | 17     | 59   | 9                    | 8      | 21   |
| 75                                                       | 1            | 57    | 49     | 173  | 31         | 14     | 4    | 72                   | 0.7    | 0.4  |
| 75                                                       | 2            | 41    | 39     | 79   | 21         | 16     | 51   | 10                   | 9      | 28   |
| 75                                                       | 3            | 38    | 39     | 60   | 21         | 17     | 48   | 9                    | 8      | 21   |
| 75                                                       | 4            | 36    | 37     | 57   | 19         | 17     | 46   | 8                    | 7      | 20   |
| 75                                                       | 5            | 36    | 37     | 57   | 19         | 17     | 46   | 8                    | 7      | 20   |
| 75                                                       | 6            | 36    | 37     | 57   | 19         | 17     | 46   | 8                    | 7      | 20   |
| 60                                                       | 1            | 57    | 49     | 173  | 31         | 14     | 4    | 72                   | 0.7    | 0.4  |
| 60                                                       | 2            | 39    | 37     | 79   | 20         | 14     | 51   | 9                    | 8      | 23   |
| 60                                                       | 3            | 34    | 33     | 58   | 19         | 15     | 46   | 8                    | 7      | 18   |
| 60                                                       | 4            | 30    | 30     | 45   | 16         | 14     | 37   | 7                    | 6      | 16   |
| 60                                                       | 5            | 30    | 30     | 45   | 16         | 14     | 36   | 7                    | 6      | 16   |
| 60                                                       | 6            | 30    | 30     | 45   | 16         | 14     | 36   | 7                    | 6      | 16   |
| 50                                                       | 1            | 57    | 49     | 173  | 31         | 14     | 4    | 72                   | 0.7    | 0.4  |
| 50                                                       | 2            | 39    | 36     | 79   | 19         | 14     | 51   | 9                    | 8      | 23   |
| 50                                                       | 3            | 33    | 31     | 58   | 18         | 15     | 45   | 8                    | 7      | 18   |
| 50                                                       | 4            | 27    | 28     | 39   | 14         | 13     | 32   | 7                    | 6      | 14   |
| 50                                                       | 5            | 26    | 26     | 39   | 13         | 12     | 32   | 6                    | 6      | 13   |
| 50                                                       | 6            | 26    | 26     | 39   | 13         | 12     | 32   | 6                    | 6      | 13   |
| 35                                                       | 1            | 57    | 49     | 173  | 31         | 14     | 4    | 72                   | 0.7    | 0.4  |
| 35                                                       | 2            | 38    | 35     | 79   | 19         | 13     | 51   | 9                    | 8      | 23   |
| 35                                                       | 3            | 30    | 25     | 58   | 16         | 13     | 45   | 7                    | 6      | 17   |
| 35                                                       | 4            | 22    | 22     | 34   | 11         | 10     | 24   | 6                    | 5      | 11   |
| 35                                                       | 5            | 20    | 20     | 28   | 10         | 9      | 23   | 5                    | 5      | 10   |
| 35                                                       | 6            | 20    | 20     | 27   | 10         | 9      | 22   | 5                    | 5      | 10   |
| 25                                                       | 1            | 57    | 49     | 173  | 31         | 14     | 4    | 72                   | 0.7    | 0.4  |
| 25                                                       | 2            | 37    | 35     | 79   | 19         | 13     | 51   | 9                    | 8      | 23   |
| 25                                                       | 3            | 29    | 22     | 58   | 16         | 12     | 45   | 7                    | 6      | 17   |
| 25                                                       | 4            | 19    | 18     | 34   | 9          | 8      | 23   | 5                    | 5      | 10   |
| 25                                                       | 5            | 15    | 15     | 20   | 7          | 7      | 16   | 4                    | 4      | 8    |
| 25                                                       | 6            | 15    | 15     | 19   | 7          | 7      | 15   | 4                    | 4      | 8    |

\* concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-6

## Concentrations of Individual THMs and HAAs at Alternate THAA MCLs

Treatment Group Code:  
 1 - SWTR w/o Alternative Disinfection  
 2 - SWTR w/ Alternative Disinfection  
 3 - ENHANCED SWTR w/o Alternative Disinfection  
 4 - ENHANCED SWTR w/ Alternative Disinfection

| Group | MCL<br>(THAAs) | THMs |        |      | Chloroform |        |      | Bromoform |        |      | Dibromochloromethane |        |      | Dibromochloromethane |        |      | THAA |        |      | TCAA |        |      |
|-------|----------------|------|--------|------|------------|--------|------|-----------|--------|------|----------------------|--------|------|----------------------|--------|------|------|--------|------|------|--------|------|
|       |                | mean | median | 95th | mean       | median | 95th | mean      | median | 95th | mean                 | median | 95th | mean                 | median | 95th | mean | median | 95th | mean | median | 95th |
| 1     | 60             | 43   | 39     | 90   | 21         | 16     | 51   | 10        | 8      | 30   | 12                   | 3      | 69   | 0.7                  | 0.3    | 3    | 19   | 17     | 43   | 9    | 8      | 22   |
| 1     | 50             | 41   | 37     | 90   | 19         | 16     | 45   | 10        | 7      | 30   | 12                   | 3      | 69   | 0.7                  | 0.3    | 3    | 19   | 17     | 38   | 9    | 8      | 19   |
| 1     | 40             | 36   | 28     | 89   | 15         | 13     | 35   | 9         | 7      | 27   | 11                   | 3      | 63   | 0.7                  | 0.4    | 3    | 16   | 15     | 30   | 6    | 7      | 16   |
| 1     | 30             | 30   | 23     | 78   | 11         | 10     | 28   | 6         | 6      | 21   | 11                   | 3      | 63   | 0.7                  | 0.4    | 3    | 12   | 12     | 23   | 6    | 6      | 12   |
| 1     | 20             | 24   | 19     | 78   | 7          | 7      | 17   | 6         | 5      | 16   | 10                   | 3      | 63   | 0.7                  | 0.4    | 3    | 9    | 15     | 4    | 4    | 3      | 9    |
| 1     | 10             | 17   | 13     | 65   | 4          | 3      | 11   | 4         | 4      | 9    | 8                    | 2      | 63   | 0.7                  | 0.4    | 2    | 6    | 5      | 11   | 2    | 2      | 5    |
| 2     | 60             | 43   | 38     | 90   | 22         | 16     | 58   | 10        | 7      | 29   | 11                   | 3      | 66   | 0.7                  | 0.3    | 3    | 21   | 18     | 43   | 10   | 10     | 22   |
| 2     | 50             | 41   | 36     | 90   | 19         | 16     | 46   | 9         | 7      | 29   | 11                   | 3      | 66   | 0.7                  | 0.3    | 3    | 20   | 18     | 38   | 10   | 10     | 19   |
| 2     | 40             | 36   | 27     | 86   | 16         | 15     | 35   | 9         | 6      | 25   | 11                   | 2      | 60   | 0.7                  | 0.3    | 3    | 17   | 18     | 31   | 9    | 9      | 16   |
| 2     | 30             | 29   | 21     | 78   | 11         | 12     | 25   | 7         | 5      | 20   | 10                   | 2      | 60   | 0.6                  | 0.3    | 3    | 15   | 17     | 24   | 8    | 9      | 13   |
| 2     | 20             | 20   | 15     | 71   | 6          | 6      | 14   | 5         | 4      | 12   | 9                    | 1      | 60   | 0.6                  | 0.3    | 2    | 10   | 11     | 16   | 5    | 6      | 13   |
| 2     | 10             | 12   | 5      | 55   | 2          | 2      | 4    | 2         | 2      | 7    | 1                    | 7      | 54   | 0.5                  | 0.2    | 2    | 6    | 6      | 9    | 3    | 3      | 6    |
| 3     | 60             | 44   | 40     | 91   | 21         | 17     | 51   | 10        | 8      | 30   | 12                   | 3      | 71   | 0.7                  | 0.3    | 3    | 20   | 18     | 42   | 10   | 9      | 22   |
| 3     | 50             | 42   | 37     | 91   | 19         | 17     | 48   | 10        | 8      | 30   | 12                   | 3      | 71   | 0.7                  | 0.3    | 3    | 19   | 18     | 37   | 9    | 9      | 19   |
| 3     | 40             | 37   | 29     | 89   | 15         | 14     | 36   | 9         | 7      | 27   | 11                   | 3      | 69   | 0.7                  | 0.4    | 3    | 16   | 15     | 31   | 8    | 7      | 17   |
| 3     | 30             | 31   | 24     | 78   | 11         | 11     | 28   | 8         | 6      | 22   | 11                   | 2      | 69   | 0.7                  | 0.4    | 3    | 13   | 12     | 23   | 6    | 6      | 12   |
| 3     | 20             | 24   | 20     | 78   | 7          | 7      | 17   | 7         | 6      | 16   | 10                   | 2      | 69   | 0.6                  | 0.4    | 3    | 9    | 9      | 15   | 4    | 4      | 9    |
| 3     | 10             | 17   | 12     | 73   | 4          | 3      | 11   | 4         | 4      | 9    | 8                    | 2      | 69   | 0.7                  | 0.4    | 2    | 6    | 5      | 11   | 2    | 2      | 5    |
| 4     | 60             | 45   | 41     | 90   | 23         | 18     | 58   | 10        | 8      | 29   | 12                   | 2      | 70   | 0.7                  | 0.3    | 3    | 22   | 20     | 44   | 10   | 10     | 22   |
| 4     | 50             | 42   | 37     | 90   | 20         | 18     | 46   | 10        | 8      | 29   | 12                   | 2      | 70   | 0.7                  | 0.3    | 3    | 20   | 20     | 39   | 10   | 10     | 18   |
| 4     | 40             | 37   | 28     | 89   | 16         | 16     | 36   | 9         | 6      | 27   | 11                   | 2      | 63   | 0.6                  | 0.3    | 3    | 18   | 19     | 31   | 9    | 10     | 16   |
| 4     | 30             | 30   | 23     | 78   | 11         | 12     | 24   | 8         | 5      | 21   | 11                   | 2      | 63   | 0.6                  | 0.3    | 3    | 15   | 17     | 22   | 8    | 9      | 12   |
| 4     | 20             | 21   | 15     | 75   | 6          | 6      | 13   | 5         | 4      | 14   | 9                    | 1      | 63   | 0.6                  | 0.3    | 2    | 10   | 11     | 16   | 5    | 6      | 9    |
| 4     | 10             | 12   | 5      | 61   | 2          | 2      | 4    | 2         | 2      | 7    | 7                    | 1      | 58   | 0.5                  | 0.2    | 2    | 6    | 6      | 9    | 3    | 3      | 6    |

\*concentration at the last treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-7

# Concentrations of Individual THMs and HAAs at Alternate THAA MCLs — SWTR w/o Alternate Disinfection —

**Treatment Code:** w/o Alternate Disinfection

- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + modify alum dose
- 4 – pre-chlor + alum dose + GAC

| MCL<br>(THAAs) | Trt<br>Code | THMs |        |      | Chloroform |        |      | Bromodichloromethane |        |      | Dibromo-chloromethane |        |      | THAA |        |      | DCAA |        |      |
|----------------|-------------|------|--------|------|------------|--------|------|----------------------|--------|------|-----------------------|--------|------|------|--------|------|------|--------|------|
|                |             | mean | median | 95th | mean       | median | 95th | mean                 | median | 95th | mean                  | median | 95th | mean | median | 95th | mean | median | 95th |
| 60             | 1           | 55   | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13                    | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 60             | 2           | 46   | 41     | 105  | 22         | 17     | 58   | 10                   | 9      | 30   | 13                    | 3      | 69   | 0.7  | 0.4    | 3    | 21   | 17     | 46   |
| 60             | 3           | 44   | 41     | 90   | 21         | 17     | 51   | 10                   | 8      | 30   | 12                    | 3      | 69   | 0.7  | 0.3    | 3    | 20   | 17     | 43   |
| 60             | 4           | 43   | 39     | 60   | 21         | 16     | 51   | 10                   | 8      | 30   | 12                    | 3      | 69   | 0.7  | 0.3    | 3    | 19   | 17     | 43   |
| 50             | 1           | 55   | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13                    | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 50             | 2           | 45   | 41     | 105  | 21         | 17     | 51   | 10                   | 8      | 30   | 13                    | 3      | 69   | 0.7  | 0.4    | 3    | 20   | 17     | 44   |
| 50             | 3           | 43   | 39     | 90   | 20         | 17     | 45   | 10                   | 8      | 30   | 12                    | 3      | 69   | 0.7  | 0.3    | 3    | 19   | 17     | 38   |
| 50             | 4           | 41   | 37     | 90   | 19         | 16     | 45   | 10                   | 7      | 30   | 12                    | 3      | 69   | 0.7  | 0.3    | 3    | 19   | 17     | 38   |
| 40             | 1           | 55   | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13                    | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 40             | 2           | 42   | 37     | 80   | 20         | 15     | 51   | 10                   | 8      | 27   | 12                    | 3      | 63   | 0.7  | 0.4    | 3    | 19   | 17     | 44   |
| 40             | 3           | 39   | 35     | 89   | 17         | 15     | 40   | 9                    | 7      | 27   | 12                    | 3      | 63   | 0.7  | 0.3    | 3    | 17   | 17     | 33   |
| 40             | 4           | 36   | 28     | 80   | 15         | 13     | 35   | 9                    | 7      | 27   | 11                    | 3      | 63   | 0.7  | 0.4    | 3    | 16   | 15     | 30   |
| 30             | 1           | 55   | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13                    | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 30             | 2           | 40   | 36     | 89   | 19         | 14     | 51   | 9                    | 8      | 23   | 12                    | 3      | 63   | 0.7  | 0.3    | 3    | 19   | 17     | 44   |
| 30             | 3           | 35   | 30     | 78   | 15         | 13     | 35   | 8                    | 7      | 21   | 11                    | 3      | 63   | 0.7  | 0.3    | 3    | 16   | 15     | 33   |
| 30             | 4           | 30   | 23     | 78   | 11         | 10     | 28   | 6                    | 6      | 21   | 11                    | 3      | 63   | 0.7  | 0.4    | 3    | 16   | 15     | 30   |
| 20             | 1           | 55   | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13                    | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 20             | 2           | 39   | 34     | 84   | 18         | 13     | 51   | 9                    | 8      | 22   | 11                    | 3      | 63   | 0.7  | 0.3    | 3    | 18   | 15     | 44   |
| 20             | 3           | 31   | 26     | 78   | 13         | 11     | 35   | 7                    | 7      | 16   | 10                    | 3      | 63   | 0.6  | 0.3    | 3    | 14   | 12     | 33   |
| 20             | 4           | 24   | 19     | 78   | 7          | 7      | 17   | 6                    | 6      | 16   | 10                    | 3      | 63   | 0.7  | 0.4    | 3    | 12   | 12     | 23   |
| 10             | 1           | 55   | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13                    | 4      | 72   | 0.8  | 0.4    | 3    | 24   | 17     | 80   |
| 10             | 2           | 38   | 34     | 79   | 18         | 12     | 51   | 9                    | 7      | 22   | 11                    | 3      | 63   | 0.6  | 0.3    | 2    | 18   | 14     | 44   |
| 10             | 3           | 28   | 25     | 70   | 11         | 7      | 35   | 7                    | 6      | 15   | 10                    | 3      | 63   | 0.6  | 0.2    | 2    | 13   | 9      | 33   |
| 10             | 4           | 17   | 13     | 65   | 4          | 3      | 11   | 4                    | 4      | 6    | 2                     | 63     | 0.7  | 0.4  | 2      | 6    | 5    | 17     |      |
|                |             |      |        |      |            |        |      |                      |        |      |                       |        |      |      |        | 11   | 11   | 1      |      |

concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL.

## Exhibit C-8

# Concentrations of Individual THMs and HAAs at Alternate THAA MCLs — SWTR w/ Alternate Disinfection —

## Treatment Code: w/ Aromatic Disinfection

- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + add ammonia
- 4 – pre-chlor + ammonia + alum dose
- 5 – pre-chlor + ammonia + alum dose + ozone
- 6 – pre-chlor + ammonia + alum dose + ozone + GAC

| MCL<br>(THAA) | Trt.<br>Code | Concentrations of By-Products (µg/L) (Average Customer)* |        |      |            |        |      | DCAA                 |        |      |       |        |      | TCAA |        |      |        |        |      | mean |        |      |      |        |      |        |        |      |
|---------------|--------------|----------------------------------------------------------|--------|------|------------|--------|------|----------------------|--------|------|-------|--------|------|------|--------|------|--------|--------|------|------|--------|------|------|--------|------|--------|--------|------|
|               |              | THMs                                                     |        |      | Chloroform |        |      | Bromodichloromethane |        |      | THAAs |        |      | mean |        |      | median |        |      | 95th |        |      | mean |        |      | median |        |      |
|               |              | mean                                                     | median | 95th | mean       | median | 95th | mean                 | median | 95th | mean  | median | 95th | mean | median | 95th | mean   | median | 95th | mean | median | 95th | mean | median | 95th | mean   | median | 95th |
| 60            | 1            | 55                                                       | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13    | 4      | 72   | 0.8  | 0.4    | 3    | 24     | 17     | 80   | 11   | 8      | 31   | 11   | 6      | 34   | 6      | 21     |      |
| 60            | 2            | 46                                                       | 41     | 105  | 22         | 17     | 58   | 10                   | 9      | 30   | 13    | 3      | 69   | 0.7  | 0.4    | 3    | 21     | 17     | 40   | 10   | 9      | 24   | 6    | 6      | 20   | 6      | 20     |      |
| 60            | 3            | 43                                                       | 38     | 90   | 22         | 16     | 56   | 10                   | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 21     | 18     | 43   | 10   | 10     | 22   | 6    | 6      | 20   | 6      | 20     |      |
| 60            | 4            | 43                                                       | 38     | 90   | 22         | 16     | 55   | 10                   | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 21     | 18     | 43   | 10   | 10     | 22   | 6    | 6      | 20   | 6      | 20     |      |
| 60            | 5            | 43                                                       | 38     | 90   | 22         | 16     | 56   | 10                   | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 21     | 18     | 43   | 10   | 10     | 22   | 6    | 6      | 20   | 6      | 20     |      |
| 60            | 6            | 43                                                       | 38     | 90   | 22         | 16     | 56   | 10                   | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 21     | 18     | 43   | 10   | 10     | 22   | 6    | 6      | 20   | 6      | 20     |      |
| 50            | 1            | 55                                                       | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13    | 4      | 72   | 0.8  | 0.4    | 3    | 20     | 17     | 80   | 11   | 8      | 31   | 11   | 6      | 38   | 6      | 19     |      |
| 50            | 2            | 45                                                       | 41     | 105  | 21         | 17     | 51   | 10                   | 8      | 30   | 13    | 3      | 68   | 0.7  | 0.4    | 3    | 20     | 18     | 40   | 10   | 10     | 20   | 8    | 6      | 18   | 6      | 18     |      |
| 50            | 3            | 42                                                       | 37     | 90   | 20         | 16     | 50   | 9                    | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 20     | 18     | 38   | 10   | 10     | 19   | 7    | 6      | 17   | 6      | 17     |      |
| 50            | 4            | 41                                                       | 36     | 90   | 19         | 16     | 46   | 9                    | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 20     | 18     | 38   | 10   | 10     | 19   | 7    | 6      | 17   | 6      | 17     |      |
| 50            | 5            | 41                                                       | 36     | 90   | 19         | 16     | 46   | 9                    | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 20     | 18     | 38   | 10   | 10     | 19   | 7    | 6      | 17   | 6      | 17     |      |
| 50            | 6            | 41                                                       | 36     | 90   | 19         | 16     | 46   | 9                    | 7      | 29   | 11    | 3      | 68   | 0.7  | 0.3    | 3    | 20     | 18     | 38   | 10   | 10     | 19   | 7    | 6      | 17   | 6      | 17     |      |
| 40            | 1            | 55                                                       | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13    | 4      | 72   | 0.8  | 0.4    | 3    | 24     | 17     | 80   | 11   | 8      | 31   | 11   | 6      | 38   | 6      | 19     |      |
| 40            | 2            | 42                                                       | 37     | 90   | 20         | 15     | 51   | 10                   | 8      | 27   | 12    | 3      | 68   | 0.7  | 0.4    | 3    | 19     | 17     | 44   | 10   | 8      | 24   | 7    | 6      | 19   | 6      | 19     |      |
| 40            | 3            | 38                                                       | 30     | 86   | 17         | 15     | 40   | 9                    | 7      | 25   | 11    | 2      | 60   | 0.7  | 0.3    | 3    | 18     | 16     | 35   | 9    | 10     | 18   | 7    | 6      | 14   | 6      | 14     |      |
| 40            | 4            | 35                                                       | 27     | 83   | 16         | 15     | 35   | 9                    | 6      | 25   | 11    | 2      | 60   | 0.7  | 0.3    | 3    | 18     | 16     | 31   | 9    | 9      | 16   | 6    | 6      | 12   | 6      | 12     |      |
| 40            | 5            | 35                                                       | 27     | 83   | 16         | 15     | 35   | 9                    | 6      | 25   | 11    | 2      | 60   | 0.7  | 0.3    | 3    | 17     | 18     | 31   | 9    | 9      | 16   | 6    | 6      | 12   | 6      | 12     |      |
| 40            | 6            | 35                                                       | 27     | 83   | 16         | 15     | 35   | 9                    | 6      | 25   | 11    | 2      | 60   | 0.7  | 0.3    | 3    | 17     | 18     | 31   | 9    | 9      | 16   | 6    | 6      | 12   | 6      | 12     |      |
| 30            | 1            | 55                                                       | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13    | 4      | 72   | 0.8  | 0.4    | 3    | 24     | 17     | 80   | 11   | 8      | 31   | 11   | 6      | 38   | 6      | 19     |      |
| 30            | 2            | 40                                                       | 36     | 89   | 19         | 14     | 51   | 9                    | 8      | 23   | 12    | 3      | 63   | 0.7  | 0.3    | 3    | 19     | 17     | 44   | 10   | 8      | 24   | 7    | 6      | 19   | 6      | 19     |      |
| 30            | 3            | 34                                                       | 26     | 78   | 16         | 13     | 35   | 8                    | 6      | 20   | 10    | 2      | 60   | 0.6  | 0.3    | 3    | 17     | 17     | 35   | 9    | 9      | 17   | 6    | 6      | 14   | 6      | 14     |      |
| 30            | 4            | 30                                                       | 22     | 78   | 12         | 12     | 28   | 7                    | 5      | 20   | 10    | 2      | 60   | 0.6  | 0.3    | 3    | 15     | 17     | 24   | 8    | 9      | 13   | 5    | 5      | 10   | 5      | 10     |      |
| 30            | 5            | 30                                                       | 22     | 78   | 12         | 12     | 28   | 7                    | 5      | 20   | 10    | 2      | 60   | 0.6  | 0.3    | 3    | 15     | 17     | 24   | 8    | 9      | 13   | 5    | 5      | 9    | 5      | 9      |      |
| 30            | 6            | 20                                                       | 15     | 71   | 11         | 12     | 25   | 7                    | 6      | 20   | 10    | 2      | 60   | 0.6  | 0.3    | 3    | 16     | 17     | 24   | 8    | 9      | 13   | 5    | 5      | 9    | 5      | 9      |      |
| 20            | 1            | 55                                                       | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13    | 4      | 72   | 0.8  | 0.4    | 3    | 24     | 17     | 80   | 11   | 8      | 31   | 11   | 6      | 38   | 6      | 19     |      |
| 20            | 2            | 39                                                       | 34     | 84   | 18         | 13     | 51   | 9                    | 8      | 22   | 11    | 3      | 63   | 0.7  | 0.3    | 3    | 18     | 15     | 44   | 9    | 8      | 24   | 6    | 6      | 19   | 6      | 19     |      |
| 20            | 3            | 29                                                       | 23     | 78   | 13         | 11     | 34   | 6                    | 5      | 15   | 9     | 1      | 60   | 0.6  | 0.2    | 3    | 16     | 15     | 35   | 8    | 8      | 17   | 6    | 6      | 14   | 6      | 14     |      |
| 20            | 4            | 23                                                       | 19     | 71   | 8          | 7      | 19   | 5                    | 4      | 12   | 9     | 1      | 60   | 0.6  | 0.2    | 2    | 13     | 13     | 24   | 7    | 7      | 13   | 4    | 4      | 9    | 4      | 9      |      |
| 20            | 5            | 22                                                       | 16     | 71   | 7          | 7      | 15   | 5                    | 4      | 12   | 9     | 1      | 60   | 0.6  | 0.2    | 2    | 12     | 13     | 20   | 6    | 7      | 11   | 4    | 4      | 7    | 4      | 7      |      |
| 20            | 6            | 20                                                       | 15     | 71   | 6          | 6      | 14   | 5                    | 4      | 12   | 9     | 1      | 60   | 0.6  | 0.2    | 2    | 10     | 11     | 16   | 6    | 6      | 9    | 3    | 3      | 5    | 3      | 5      |      |
| 10            | 1            | 55                                                       | 46     | 173  | 30         | 16     | 113  | 11                   | 9      | 31   | 13    | 4      | 72   | 0.8  | 0.4    | 3    | 24     | 17     | 80   | 11   | 8      | 31   | 11   | 6      | 38   | 6      | 19     |      |
| 10            | 2            | 38                                                       | 34     | 79   | 18         | 12     | 51   | 9                    | 7      | 22   | 11    | 3      | 63   | 0.6  | 0.3    | 2    | 18     | 14     | 44   | 9    | 8      | 24   | 6    | 4      | 19   | 6      | 19     |      |
| 10            | 3            | 26                                                       | 20     | 71   | 12         | 8      | 34   | 5                    | 4      | 12   | 8     | 1      | 54   | 0.5  | 0.2    | 2    | 16     | 15     | 35   | 8    | 8      | 17   | 5    | 5      | 14   | 5      | 14     |      |
| 10            | 4            | 18                                                       | 14     | 58   | 6          | 5      | 19   | 4                    | 3      | 8    | 7     | 1      | 54   | 0.4  | 0.1    | 2    | 12     | 10     | 24   | 6    | 5      | 13   | 3    | 3      | 9    | 3      | 9      |      |
| 10            | 5            | 15                                                       | 11     | 55   | 5          | 3      | 13   | 3                    | 3      | 7    | 7     | 1      | 54   | 0.4  | 0.1    | 2    | 10     | 8      | 20   | 5    | 4      | 11   | 3    | 2      | 7    | 3      | 2      |      |
| 10            | 6            | 12                                                       | 5      | 55   | 2          | 2      | 4    | 2                    | 2      | 7    | 7     | 1      | 54   | 0.5  | 0.2    | 2    | 10     | 8      | 20   | 5    | 4      | 11   | 3    | 2      | 7    | 3      | 2      |      |

concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-9

# Concentrations of Individual THMs and HAAs at Alternate THAA MCLs – Enhanced SWTR w/o Alternate Disinfection –

**w/o Alternate Disinfection**

- 1 – not requiring further treatment modification
- 2 – eliminate pre-chlorination
- 3 – eliminate pre-chlor + modify alum dose
- 4 – pre-chlor + alum dose + GAC

| MCL<br>THAAs) | Trt<br>Code | Concentrations of By-Products (ug/L) (Average Customer)* |        |      |            |        |      |                      |        |      |           |        |      | DCAA |        |      |      |        |      |    |    |    |    |   |    |
|---------------|-------------|----------------------------------------------------------|--------|------|------------|--------|------|----------------------|--------|------|-----------|--------|------|------|--------|------|------|--------|------|----|----|----|----|---|----|
|               |             | TTHMs                                                    |        |      | Chloroform |        |      | Bromodichloromethane |        |      | Bromoform |        |      | mean | median | 95th | mean | median | 95th |    |    |    |    |   |    |
|               |             | mean                                                     | median | 95th | mean       | median | 95th | mean                 | median | 95th | mean      | median | 95th | mean | median | 95th | mean | median | 95th |    |    |    |    |   |    |
| 60            | 1           | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   | 14        | 4      | 72   | 0.7  | 0.4    | 3    | 25   | 18     | 80   | 11 | 8  | 31 | 11 | 7 | 38 |
| 60            | 2           | 48                                                       | 42     | 108  | 23         | 17     | 60   | 11                   | 9      | 30   | 13        | 3      | 71   | 0.7  | 0.4    | 3    | 21   | 18     | 47   | 10 | 10 | 25 | 8  | 7 | 21 |
| 60            | 3           | 45                                                       | 42     | 91   | 22         | 17     | 51   | 11                   | 9      | 30   | 12        | 3      | 71   | 0.7  | 0.3    | 3    | 20   | 18     | 42   | 10 | 10 | 22 | 8  | 7 | 19 |
| 60            | 4           | 44                                                       | 40     | 91   | 21         | 17     | 51   | 10                   | 8      | 30   | 12        | 3      | 71   | 0.7  | 0.3    | 3    | 20   | 18     | 42   | 10 | 10 | 22 | 8  | 7 | 19 |
| 50            | 1           | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   | 14        | 4      | 72   | 0.7  | 0.4    | 3    | 25   | 18     | 80   | 11 | 8  | 31 | 11 | 7 | 38 |
| 50            | 2           | 46                                                       | 39     | 108  | 22         | 17     | 51   | 11                   | 6      | 30   | 13        | 3      | 71   | 0.7  | 0.4    | 3    | 21   | 18     | 45   | 10 | 10 | 25 | 8  | 7 | 19 |
| 50            | 3           | 43                                                       | 38     | 91   | 20         | 17     | 46   | 10                   | 8      | 30   | 12        | 3      | 71   | 0.7  | 0.3    | 3    | 19   | 18     | 37   | 9  | 10 | 19 | 7  | 7 | 17 |
| 50            | 4           | 42                                                       | 37     | 91   | 19         | 17     | 46   | 10                   | 8      | 30   | 12        | 3      | 71   | 0.7  | 0.3    | 3    | 19   | 18     | 37   | 9  | 9  | 19 | 7  | 6 | 17 |
| 40            | 1           | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   | 14        | 4      | 72   | 0.7  | 0.4    | 3    | 25   | 18     | 80   | 11 | 8  | 31 | 11 | 7 | 38 |
| 40            | 2           | 44                                                       | 37     | 90   | 21         | 17     | 51   | 10                   | 8      | 27   | 12        | 3      | 69   | 0.7  | 0.4    | 3    | 20   | 18     | 45   | 10 | 9  | 25 | 7  | 6 | 19 |
| 40            | 3           | 40                                                       | 35     | 89   | 18         | 17     | 41   | 10                   | 7      | 27   | 12        | 3      | 69   | 0.7  | 0.3    | 3    | 18   | 18     | 34   | 9  | 9  | 18 | 6  | 6 | 15 |
| 40            | 4           | 37                                                       | 29     | 89   | 15         | 14     | 36   | 9                    | 7      | 27   | 11        | 3      | 69   | 0.7  | 0.4    | 3    | 16   | 15     | 31   | 8  | 7  | 17 | 6  | 5 | 12 |
| 30            | 1           | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   | 14        | 4      | 72   | 0.7  | 0.4    | 3    | 25   | 18     | 80   | 11 | 8  | 31 | 11 | 7 | 38 |
| 30            | 2           | 42                                                       | 37     | 89   | 20         | 16     | 51   | 10                   | 8      | 26   | 12        | 3      | 69   | 0.7  | 0.3    | 3    | 19   | 18     | 45   | 10 | 9  | 25 | 7  | 6 | 19 |
| 30            | 3           | 36                                                       | 30     | 78   | 15         | 13     | 40   | 9                    | 7      | 22   | 11        | 3      | 69   | 0.6  | 0.3    | 3    | 16   | 16     | 34   | 8  | 8  | 17 | 6  | 5 | 15 |
| 30            | 4           | 31                                                       | 24     | 78   | 11         | 11     | 28   | 6                    | 6      | 22   | 11        | 2      | 69   | 0.7  | 0.4    | 3    | 13   | 12     | 23   | 6  | 6  | 12 | 4  | 4 | 9  |
| 20            | 1           | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   | 14        | 4      | 72   | 0.7  | 0.4    | 3    | 25   | 18     | 80   | 11 | 8  | 31 | 11 | 7 | 38 |
| 20            | 2           | 40                                                       | 36     | 89   | 19         | 13     | 51   | 9                    | 8      | 23   | 12        | 3      | 69   | 0.6  | 0.3    | 3    | 19   | 15     | 45   | 10 | 8  | 25 | 7  | 6 | 19 |
| 20            | 3           | 32                                                       | 25     | 78   | 13         | 11     | 40   | 8                    | 7      | 18   | 11        | 3      | 69   | 0.6  | 0.3    | 3    | 14   | 13     | 34   | 7  | 6  | 17 | 5  | 4 | 15 |
| 20            | 4           | 24                                                       | 20     | 78   | 7          | 7      | 17   | 6                    | 6      | 16   | 10        | 2      | 69   | 0.6  | 0.4    | 3    | 9    | 9      | 16   | 4  | 4  | 13 | 3  | 3 | 6  |
| 10            | 1           | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                   | 9      | 31   | 14        | 4      | 72   | 0.7  | 0.4    | 3    | 25   | 18     | 80   | 11 | 8  | 31 | 11 | 7 | 38 |
| 10            | 2           | 39                                                       | 36     | 82   | 18         | 13     | 51   | 9                    | 8      | 23   | 11        | 3      | 69   | 0.6  | 0.3    | 3    | 19   | 15     | 45   | 9  | 8  | 25 | 7  | 5 | 19 |
| 10            | 3           | 28                                                       | 24     | 73   | 11         | 6      | 40   | 7                    | 6      | 15   | 10        | 2      | 69   | 0.5  | 0.2    | 2    | 13   | 9      | 34   | 6  | 5  | 17 | 4  | 2 | 15 |
| 10            | 4           | 17                                                       | 12     | 73   | 4          | 3      | 11   | 4                    | 4      | 8    | 6         | 2      | 69   | 0.7  | 0.4    | 2    | 6    | 5      | 11   | 2  | 2  | 5  | 1  | 1 | 4  |

concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

## Exhibit C-10

# Concentrations of Individual THMs and HAAs at Alternate THAA MCLs — Enhanced SWTR w/ Alternate Disinfection —

Treatment Code: w/ Alternate Disinfection

- 1 — not requiring further treatment modification
- 2 — eliminate pre-chlorination
- 3 — eliminate pre-chlor + add ammonia
- 4 — pre-chlor + ammonia + alum dose
- 5 — pre-chlor + ammonia + alum dose + ozone
- 6 — pre-chlor + ammonia + alum dose + ozone + GAC

| MCL<br>(THAA) | Tit.<br>Code | Concentrations of By-Products (ug/L) (Average Customer)* |        |      |            |        |      | TCAs                         |        |      |      |        |      |      |        |      |    |    |
|---------------|--------------|----------------------------------------------------------|--------|------|------------|--------|------|------------------------------|--------|------|------|--------|------|------|--------|------|----|----|
|               |              | THMs                                                     |        |      | Chloroform |        |      | Bromoform/bromochloromethane |        |      | THAs |        |      | DCAA |        |      |    |    |
|               |              | mean                                                     | median | 95th | mean       | median | 95th | mean                         | median | 95th | mean | median | 95th | mean | median | 95th |    |    |
| 60            | 1            | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                           | 9      | 31   | 14   | 4      | 25   | 18   | 80     | 11   | 7  | 38 |
| 60            | 2            | 48                                                       | 42     | 109  | 23         | 17     | 60   | 11                           | 9      | 30   | 13   | 3      | 21   | 18   | 47     | 10   | 10 | 25 |
| 60            | 3            | 46                                                       | 42     | 93   | 24         | 18     | 60   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 45     | 11   | 10 | 23 |
| 60            | 4            | 45                                                       | 41     | 90   | 23         | 18     | 58   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 44     | 10   | 10 | 22 |
| 60            | 5            | 45                                                       | 41     | 90   | 23         | 18     | 58   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 44     | 10   | 10 | 22 |
| 60            | 6            | 46                                                       | 41     | 90   | 23         | 18     | 58   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 44     | 10   | 10 | 22 |
| 50            | 1            | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                           | 9      | 31   | 14   | 4      | 25   | 18   | 80     | 11   | 8  | 31 |
| 50            | 2            | 46                                                       | 39     | 109  | 22         | 17     | 51   | 11                           | 8      | 30   | 13   | 3      | 21   | 18   | 45     | 10   | 10 | 25 |
| 50            | 3            | 44                                                       | 39     | 93   | 22         | 18     | 50   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 45     | 10   | 10 | 20 |
| 50            | 4            | 43                                                       | 38     | 90   | 21         | 18     | 46   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 45     | 10   | 10 | 20 |
| 50            | 5            | 42                                                       | 37     | 89   | 20         | 18     | 46   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 45     | 10   | 10 | 20 |
| 50            | 6            | 42                                                       | 37     | 89   | 20         | 18     | 46   | 10                           | 8      | 29   | 12   | 2      | 20   | 18   | 45     | 10   | 10 | 20 |
| 40            | 1            | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                           | 9      | 31   | 14   | 4      | 25   | 18   | 80     | 11   | 8  | 31 |
| 40            | 2            | 44                                                       | 37     | 90   | 21         | 17     | 51   | 10                           | 8      | 27   | 12   | 3      | 20   | 18   | 45     | 10   | 9  | 25 |
| 40            | 3            | 41                                                       | 36     | 89   | 20         | 17     | 45   | 9                            | 7      | 27   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 40            | 4            | 38                                                       | 29     | 89   | 17         | 16     | 37   | 9                            | 6      | 27   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 40            | 5            | 37                                                       | 29     | 89   | 16         | 16     | 36   | 9                            | 6      | 27   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 40            | 6            | 37                                                       | 29     | 89   | 16         | 16     | 36   | 9                            | 6      | 27   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 30            | 1            | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                           | 9      | 31   | 14   | 4      | 25   | 18   | 80     | 11   | 8  | 31 |
| 30            | 2            | 42                                                       | 37     | 89   | 20         | 16     | 51   | 10                           | 8      | 26   | 12   | 3      | 20   | 18   | 45     | 10   | 9  | 25 |
| 30            | 3            | 37                                                       | 30     | 88   | 18         | 16     | 45   | 8                            | 7      | 21   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 30            | 4            | 32                                                       | 25     | 78   | 13         | 12     | 28   | 6                            | 6      | 21   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 30            | 5            | 30                                                       | 23     | 78   | 11         | 12     | 25   | 6                            | 5      | 21   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 30            | 6            | 30                                                       | 23     | 78   | 11         | 12     | 24   | 6                            | 5      | 21   | 11   | 2      | 23   | 18   | 36     | 10   | 10 | 18 |
| 20            | 1            | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                           | 9      | 31   | 14   | 4      | 25   | 18   | 80     | 11   | 8  | 31 |
| 20            | 2            | 40                                                       | 36     | 89   | 19         | 13     | 61   | 9                            | 8      | 23   | 12   | 3      | 20   | 18   | 45     | 10   | 8  | 25 |
| 20            | 3            | 33                                                       | 25     | 82   | 16         | 13     | 45   | 7                            | 6      | 18   | 10   | 2      | 23   | 18   | 36     | 9    | 9  | 18 |
| 20            | 4            | 26                                                       | 20     | 75   | 10         | 9      | 23   | 6                            | 5      | 15   | 9    | 2      | 23   | 18   | 36     | 7    | 7  | 14 |
| 20            | 5            | 23                                                       | 17     | 75   | 7          | 7      | 15   | 6                            | 4      | 14   | 9    | 1      | 23   | 18   | 36     | 6    | 7  | 11 |
| 20            | 6            | 21                                                       | 15     | 75   | 6          | 6      | 13   | 5                            | 4      | 14   | 9    | 1      | 23   | 18   | 36     | 6    | 6  | 10 |
| 10            | 1            | 57                                                       | 49     | 173  | 31         | 17     | 114  | 12                           | 9      | 31   | 14   | 4      | 25   | 18   | 80     | 11   | 8  | 31 |
| 10            | 2            | 39                                                       | 36     | 82   | 18         | 13     | 51   | 9                            | 8      | 23   | 11   | 3      | 20   | 18   | 45     | 10   | 9  | 25 |
| 10            | 3            | 31                                                       | 24     | 79   | 15         | 10     | 45   | 6                            | 5      | 17   | 9    | 1      | 23   | 18   | 36     | 9    | 9  | 18 |
| 10            | 4            | 21                                                       | 16     | 71   | 8          | 5      | 23   | 5                            | 4      | 10   | 8    | 1      | 23   | 18   | 36     | 7    | 6  | 14 |
| 10            | 5            | 16                                                       | 10     | 61   | 5          | 3      | 13   | 3                            | 3      | 8    | 7    | 1      | 23   | 18   | 36     | 5    | 4  | 11 |
| 10            | 6            | 12                                                       | 6      | 61   | 5          | 2      | 12   | 2                            | 2      | 7    | 7    | 1      | 23   | 18   | 36     | 3    | 2  | 7  |

\* concentration at each treatment tier of all systems; those meeting MCL and those not meeting MCL

