



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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October 12, 1989

OFFICE OF
THE ADMINISTRATOR

Honorable William K. Reilly
Administrator
U. S. Environmental Protection Agency
401 M Street, S. W.
Washington, D. C. 20460

Dear Mr. Reilly:

During FY89 the Science Advisory Board (SAB) and the Office of Drinking Water (ODW) have participated in an innovative approach in providing scientific and engineering advice to the Agency. We are writing to inform you of the procedure and to describe briefly its generally successful results to date.

Often in the past the SAB has remarked on the need to be involved with the analysis of the scientific case early in the development of a regulatory position by the Agency. The goal is to assist the Agency in establishing a firm technical foundation upon which to construct its risk management policy. The more complex the technical issue, the more important it is to build that solid foundation early, a process which includes identifying critical research activities that should be conducted in the near- to mid-term.

The question of appropriate methods for disinfecting drinking water was chosen as an example of a complex topic in which early consultation with the SAB could prove to be particularly valuable. Specifically, the Agency is considering disinfection processes as alternatives to the traditional chlorination process that has been used in this country for so long. Before proposing specific regulations in this area, the Agency must sort through a myriad of scientific and engineering issues such as the efficacy of the different disinfection processes, the engineering aspects of the various approaches, the detection and identification of disinfection byproducts, and the toxicology of those substances.

In a series of public meetings (Oct. 13-14, 1988; Dec. 1-2, 1988; and April 6-7, 1989), the Drinking Water Subcommittee (DWS) of the SAB's Environmental Health Committee (EHC) and ODW met to examine these complex technical questions. These meetings were unique in that the Agency and the SAB have been discussing -- in a generally collegial manner -- the scientific basis for the regulatory approach, far in advance of a formal SAB review of a technical document describing an established Agency position, which has been the more traditional point of input for the SAB.

In contrast to historical practice, the DWS communicated a summary of these deliberations directly to ODW on June 30, 1989. The DWS highlighted particular issues, identified research gaps, and suggested alternative approaches to resolving certain conceptual problems; e.g., evaluating the toxicity of innumerable disinfection byproducts. That summary was not reviewed by the EHC or the Executive Committee of the SAB; therefore, it does not constitute a formal SAB report and is not intended to prompt a formal response from the Agency. The ODW is in the process of developing a "strawman regulation" for disinfection and disinfection byproducts that will be reviewed by the Subcommittee this fall and will result in a formal SAB report.

We are watching with interest to determine whether this experimental use of early and less formal, but still public, interaction with the program office has been of such benefit as to recommend a similar procedure in other situations. In any event, it is our intent, in keeping with comments you have made, to continue exploring additional avenues by which the SAB can be of assistance to the Agency.

Sincerely,



Raymond C. Loehr, Chairman
Executive Committee
Science Advisory Board



Gary P. Carlson, Chairman
Drinking Water Subcommittee
Science Advisory Board