

# Partnering with Other Agencies to Conduct Compliance Assistance for Small Public Water Supply System

## *Presented by*

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**Partnering with Other Federal Agencies  
To Conduct Compliance Assistance  
For Interstate Carrier Conveyances**

**National Compliance Assistance Forum  
December 2002**

# Goal/Outcomes

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- **Discuss ICC Program & Partnership Phases**
- **Identify Challenges and Options**
- **Discuss Lessons Learned/Tools**

# **FDA/EPA Partnership Phases**

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- **The Historical Partnership**
- **The Initial Partnership**
- **The Evolving/Future Partnership**

# Historical Partnership

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# What is an ICC Anyway?

## FDA/EPA Roles

- PWS Delivers Water to Watering Points (WP)
- Potable Water is loaded onto ICC
- ICCs Provides Water For Drinking, Sanitation, and Culinary Purposes

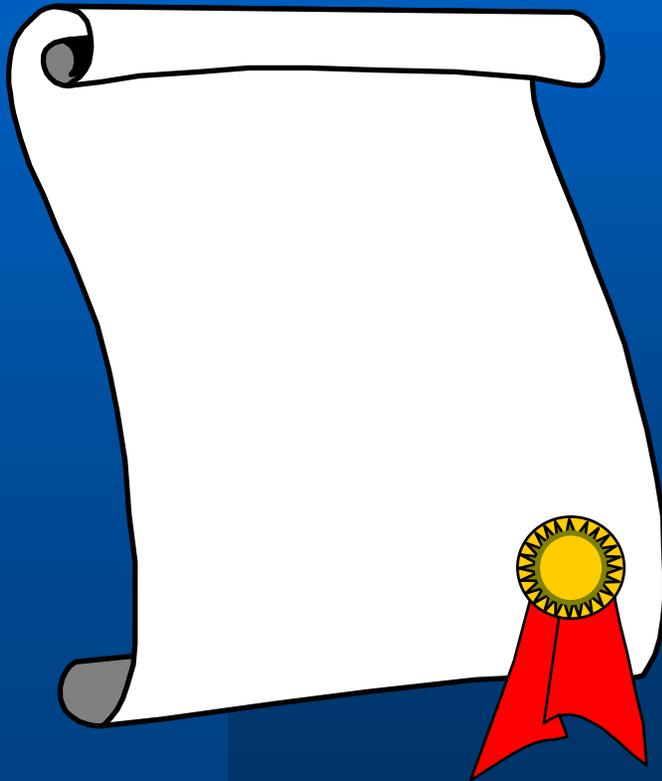


# Historical Program Regulations and Documents

- Regulations
- Four Guidances
- MOU with FDA



# FDA/EPA MOU



- **Date: 10-01-80**
- **Duration: Modify or Terminated within 30 days of advance written notice**
- **Reviewed Annually**

# Historical Activities

## EPA ICC Activities

- Ensure ICCs Monitor (Coliform, Turbidity) or
- Review/Approve Operation & Maintenance (O & M) Plans
- Regulate ICCs
- Enforce the National Primary Drinking Water Regulations

# Historical Requirements

## FDA ICC Responsibilities

- Inspection and Approval of Servicing Areas for Conveyances
- Approval of Watering Points and Watering Equipment
- Approval of Treatment Aboard Conveyances
- Protection of Pier Water Systems
- Potable Water Systems on Vessels
- Sanitation of Water Boats

# Historical Requirements

## EPA/FDA Joint Responsibilities



# Historical Partnership

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- **Challenges and Remedies**
- **Lessons Learned**

# The Initial Partnership

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# **Initial Partnership**

## **- Project Specific Activity**

- **Obtain Compliance Assistance Contract Dollars From OC – Regions 3, 4, & 10**
- **Develop Relationship w/FDA**
- **Develop Compliance Assistance Materials and Program - Jointly**

# Reasons To Provide Compliance Assistance

- Large, Unknown Universe
- EPA Regional Activity Variable
- FDA/EPA Interaction Minimal
- Risk & The Possibility of Other Incidences - Unknown

# Press Releases & News Stories

<b>10-23-01</b>	<b>Voluntary testing indicated legionella bacteria on one KLM aircraft</b>
<b>03-02-00</b>	<b>United Airlines cited for not properly protecting DW Per FAA</b>
<b>05-06-00</b>	<b>News crew took samples on Northwest Airlines, coliform hits reported</b>
<b>1997</b>	<b>Amtrak report 17 cars tested positive for coliform</b>

# What We Needed To Know Quickly

- # of ICCs that Obtain Water from a PWS/WP information
- Population Exposure
- Vulnerability Risks (FDA Priority)
- Monitoring/Disinfection History

# Stop and Gather More Information!

- Draft Risk Characterization and Exposure Assessment (RCEA)
- Compliance Assistance - On Hold Pending RCEA Results
- New Program Direction



# Initial Partnership

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- **Challenges and Remedies**
  
- **Lessons Learned**

# **The Evolving/Future Partnership**

# Inventory/Universe

	<b>TNC</b>	<b>Airplane</b>	<b>Trains</b>	<b>Water Vessel</b>
<b>#</b>	<b>92,000</b>	<b>12 Major</b> <b>15 Nat'l</b> <b>24 Reg</b>	<b>Amtrak</b>  <b>Five</b> <b>Commuter</b>	<b>38</b> <b>Ferries</b>  <b>???</b> <b>Ships</b>
<b>Pop. (mil)</b>	<b>13</b>	<b>640</b>	<b>278.5</b>	<b>503</b>

# Trains

- Relationship

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## Water Passenger Vessels

- Categories
- Vessel Sanitation Program
  - Port Responsibility
  - Recent Incidences
- Water Barges

# **Airplanes, Trains, Water Passenger Vessels**

- **Potable Water Use**
- **Monitoring**
- **O & M Standards**
- **Contamination Vulnerability  
(Pressure/Non Pressure Trucks)**

# Program Evaluation/Concerns

- Program Implementation
- Tracking Incidents
- ICCs Unclear on Responsibilities
- Regulations and Guidance Conflict
- Monitoring of ICCs & Reporting to EPA/FDA Results

# Recent News Stories



- **Wall Street Journal  
Aircraft Water -  
Is it Safe?  
(Nov 1, 2002)**
- **Holland American  
Cruise Line  
3rd Viral Outbreak  
(Nov 12, 2002)**

# Summary of Issues

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- **Potential Risk from ICCs**
- **Need EPA/FDA/ICC/Other Stakeholders Information**
- **Additional Data Analyses Needed**
- **Dialogue Critical (ICCs, EPA, FDA)**

**Current ICC Activities  
And  
Next Steps**

# Activities & Next Steps

- **Explore Need For Additional Data**
- **Develop Viable Program Options**
- **Internal Discussions**
- **Involve Stakeholders**
- **Restart Compliance Assistance Efforts** (Once Program is Redefined)

# Potential Options/Subset of Options

- **Maintain Current Program**
  - Using Existing Resources
  - Increase Resources
- **Implement Self-Certification Program**
  - Meets Minimal Requirements
  - Placard Program
- **Change Regulations and/or Guidance**
- **Use Integrated Strategies/Other Options**

# **Evolving/Future Partnership**

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- **Challenges**
- **Effective Partnership Tools**

# General Discussion and Questions

# **For Further Information On The National ICC Program**

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