

## Appendix 26 – IG Recommendations

- (26) Please identify all **recommendations** identified by the Office of the Inspector General, D.C. Auditor, or other federal or local oversight entities during the previous 3 years. Please provide an update on what actions have been taken to address these recommendations.

### **The following recommendations were received from U.S. EPA Region III:**

#### 2012

**Recommendation** – 2012 SDWA Monitoring Schedule: On January 12, 2012, the Environmental Protection Agency (EPA) Region III recommended that DC Water change the Stage 2 DBP monitoring schedule to be the same as the Stage 1 DBP monitoring schedule: during the second month of each quarter (February, May, August, and November) versus March, June, September and December. DC Water revised the Stage 2 DBP monitoring plan to comply with EPA Region III's recommendation.

#### 2011

**Recommendation** - On January 7, 2011 U.S. Department of Health and Human Services (HHS) and EPA published a recommendation to change the optimal fluoride levels in drinking water from 0.7 ppm – 1.2 ppm to 0.7 ppm.

**Follow-up Action** - On January 7, 2011, the U.S. Army Corps of Engineers Washington Aqueduct adjusted the amount of fluoride added during the drinking water treatment process to the optimal level of 0.7 ppm. The average fluoride level in District drinking water had been 0.9 ppm, within the range previously recommended by HHS.

#### 2010

**Recommendation** – 2011 SDWA Monitoring Schedule: On December 16, 2010, the Environmental Protection Agency (EPA) Region III recommended that DC Water change the disinfection byproduct monitoring schedule from the first month of the quarter to the second month of every quarter to account for sampling during August which is typically the warmest month of the year and could potentially have higher disinfection byproduct readings. In addition, EPA Region III recommended that DC Water change how we monitor for Optimal Corrosion Control by spreading out the sampling to 5 samples per quarter instead of 10 samples per six month monitoring period.

**Follow-up Action** – February 2011, DC Water implemented revisions to monitoring schedule for both recommendations.

**Recommendation** – EPA HQ issued a national recommendation and guidance for utilities to sample for Hexavalent Chromium (Chromium VI) in the drinking water.

**Follow-up Action** – On February 9, 2011, DC Water began monitoring for Chromium VI as directed in the guidance.

**The following recommendation was received approximately two years ago during the 2010 Blue Plains audit:**

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During the Blue Plains audit, questions were raised concerning DC Water's Swirl Operations, although specific recommendations were not given. However, DC Water did establish a standard operating procedure as a result of the audit.

**The following recommendations were received in December 2010 from the District of Columbia Department of the Environment (DDOE) regarding DC Water's Paint Shop and Main Laboratory during its annual review of DC Water's Hazardous Waste Program:**

### **Recommendations for Paint Shop:**

1. Post "Danger Hazardous Holding Area" sign on the wall of the room.
2. Use only one five gallon plastic bucket to collect the used product.
3. Label the five gallon bucket with a Hazardous Waste sticker and write the start accumulation date on the label.
4. The bucket must remain inside the secondary pan at all times.
5. When not in use, the lid must be placed back onto the bucket and remain closed.
6. When the bucket is full or within 90 days (whichever occurs first) contact appropriate personnel to place the bucket in the hazardous waste holding building.

**Follow-up Actions** – All the DDOE recommendations for the Paint Shop have been implemented.

### **Recommendations for the Main Laboratory:**

1. Post "Danger Hazardous Waste holding Area" signs in the laboratory rooms where the waste is generated and stored.
2. Ensure that all the containers are properly labeled with a Hazardous Waste sticker and write the start accumulation date on the label.
3. Ensure that the tops or lids are kept on the containers at all times, except when waste is being transferred into the 30 gallon drum.
4. Maintain the drum and pails in a secondary containment.
5. When the 30 gallon drum and/or five gallon pail is full or within 90 days (whichever occurs first) contact the appropriate personnel to arrange a pick-up from Clean Venture.

**Follow-up Actions** – All the DDOE recommendations for the Main Laboratory have been implemented.