



City of Muskogee

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Clay McAlpine, P.E., L.S.
Director of Engineering

Senator Inhofe, Chairman
Committee on Environment and Public Works
Washington, D.C. 20510-6175

RE: Committee Field Hearing
Tulsa, Ok
July 26, 2004

Dear Senator Inhofe:

As a member of the Oklahoma Municipal League Technical Advisory Committee on Water Issues and the Director of Engineering for the City of Muskogee, I would like to thank you and your committee for this opportunity to speak with you concerning the growing cost associated with the new provisions of the Safe Water Drinking Act. The City of Muskogee operates a regional water treatment plant supplying water to approximately 55,000 people. Although the water treatment plant is old, the City has made numerous modifications and upgrades to meet the needs of the customers and to maintain compliance with the treatment regulations. Our water system was in compliance with all of the provisions of the Act prior to 2002.

January 2002 ushered in new regulations that include the Interim Enhanced Surface Water Treatment Rule and the Stage 1 Disinfection Byproducts Rule. Compliance with these regulations has placed a significant burden on our plant and our budget. We began making modifications to our treatment system in 2000. We were looking for the best treatment method using existing equipment and different treatment chemicals (coagulants) to achieve compliance with the new regulations.

Prior to the recent change in regulations, utilities and chemical costs represented about 50% of our overall treatment cost. Utility and chemical costs fluctuate the most and consequently are the hardest to control. Labor, upkeep of equipment and insurance represent the remaining costs. The cost of chemicals has changed as a result of the new regulations. Before the new regulations, chemicals represented about 21% of the overall treatment cost. With the addition of the new treatment regulations, we have seen this cost go as high as 37% of our overall cost.

As shown in Table I, our cost of treatment chemicals has almost doubled in recent years.

Table I
Annual Cost of Utilities & Chemicals
For
Water Treatment, Muskogee, Ok

	FY 99-00	FY 00-01	FY01-02	FY 02-03	FY 03-04
Chemicals	\$259,571	\$410,260	\$570,004	\$537,558	\$428,046
Electrical	\$336,909	\$508,331	\$362,658	\$351,296	\$381,684
Total	\$596,480	\$918,591	\$932,662	\$888,854	\$809,730
Million Gallons of Water Produced	5,227.588	5,680.448	5,005.641	4,378.118	4,296.087
Chemical Cost per 1000 gals	\$0.05	\$0.07	\$0.11	\$0.12	\$0.10
Electrical Cost per 1000 gals	\$0.06	\$0.09	\$0.07	\$0.08	\$0.09

Unfortunately, changing chemicals and increasing their feed rate has not brought our treatment plant into total compliance. Although we are complying with the requirements for Trihalomethane, Haloacetic Acids, and Turbidity, we are still having problems with the Total Organic Carbon (TOC) Removal Rule. Recent plant trials have shown some positive results, and we are confident that we will be able to comply with all of the new regulations within a short period of time.

When treatment cost increase, other items are sacrificed. In this case, funds that could have gone to replace old and aging water system infrastructure have been diverted to treatment. I can't help but question if we are best serving the public's interest by reducing the level of Trihalomethane from 100 part per billion (ppb) to 80 ppb, or should we replace their old 2" water main with a new 6" main that provides fire protection?

I am very concerned with the provisions of the Stage 2 Disinfection Byproducts Rule. These proposed regulations will eliminate the utility's ability to average the Trihalomethane and Haloacetic Acid readings across the system's distribution system. The regulations will require the utility company to identify the areas of the system that have the highest readings and start monitoring these areas for compliance. Complying with these regulations will place an additional burden on the utility company, require changes in the treatment and disinfection process, and once again add additional cost to the treatment process.

The preamble for these regulations, prepared by EPA dated October 17, 2001 do not make a compelling case for the risk associated with the long term exposure to these byproducts. Page 45 of the report states "As in the Stage 1 DBPR, the assessment of public health risk from DBPs currently relies on inherently difficult analyses of incomplete empirical data." The tone of the preamble states "it is appropriate and prudent to err on the side of public health protection." I therefore, question if these proposed regulations are truly serving the public's health interest in the most cost

effective manner? Especially, since the added cost is preventing the utility companies from doing more basic improvements that have proven their worth over time.

Our goal is to provide our customers and citizens with an abundant, safe and dependable quality drinking water that meets all health and environmental guidelines at a cost they can afford. Please keep this in mind when reviewing the need for these additional regulations.

Thank you for the opportunity to share our concerns regarding these new and proposed provisions of the Safe Water Drinking Act.

Sincerely,

Clay McAlpine, P.E., L.S.
Director of Engineering
City of Muskogee, Ok

CC: Lynne Parrish
Michele Nellenbach