PHILADELPHIA WATER
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Howard M. Neukrug P.E., Water Commissioner

Philadelphia Water submitted a routine comment letter to the Pennsylvania Department of Environmental Protection (PADEP) on October 14, 2015 regarding a hazardous material recycling facility proposed for a location approximately 15 miles upstream from our Baxter Drinking Water Treatment Plant on the Delaware River. Due to the sensitive nature of this proposed industrial development, the comment letter has attracted public attention.

Philadelphia Water's role in the public comment process is to provide PADEP and other regulators with information regarding potential risks to drinking water sources, which in this example included a worst-case scenario. It is the role of PADEP and other regulators to interpret that information when deciding on permit applications.

This discussion is intended to add context to Philadelphia Water comments in the form of Frequently Asked Questions (FAQ) we have received. For reference, our full comments may be found here.

FAQ: Philadelphia Water's Comments on the Proposed Elcon Hazardous Waste Treatment Facility

What Did Philadelphia Water Say Would Be 'Catastrophic'?

We recognize that, given the sensitivity surrounding the Elcon Recycling Services proposal, the use of word "catastrophic" in our initial comments to the PADEP was unintentionally alarming and created the potential for our message to be taken out of context.

Instead of condensing all potential risks and uncertainties into one word, we could have been more descriptive. To clarify: **any event requiring the closure of a drinking water intake for any amount of time is considered catastrophic.** We recognize there are many existing industrial facilities located upstream of the drinking water intake, and that our industrial partners work to maintain state-of-the-art facilities in full compliance with all environmental regulations. Given all of the industrial development upstream of Philadelphia, we have had to close our intakes only once following an industrial accident in 2006 on a tributary to the Schuylkill River. Philadelphia Water works to prevent any increased risk of closing drinking water intakes whenever possible.

Why Did Philadelphia Water Submit Comments to PADEP Regarding the Proposed Elcon Location?

We routinely submit comments to regulatory agencies such as the PADEP when a proposed facility or policy change has the potential to impact our drinking water. The safety of our customers and their right to top quality drinking water is our highest priority.

Our core mission is the provision of safe, high quality drinking water 24 hours a day, seven days a week, to 1.61 million people. Therefore, it is our responsibility to participate in the public comment process if proposed hazardous waste facilities not automatically excluded by existing permit criteria could impact drinking water supplies in the event of a worst-case scenario incident, such as a major accident or spill.

Why Did Philadelphia Water Recommend Elcon's Phase 1 Site Permit Be Denied?

We recognize there are many existing industrial facilities located upstream of the drinking water intake, and that our industrial partners work to maintain state-of-the-art facilities in full compliance with all environmental regulations. Our recommendation that Elcon's Phase 1 site permit be denied is solely based on the location of the proposed plant above the Baxter intake and adjacent to the tidal Delaware River.

The proposed location of the Elcon hazardous waste facility is located within "Zone A" of the Source Water Assessment Plan for Philadelphia Water. The Source Water Assessment Plan is a PADEP regulatory requirement completed in 2002 and continuously updated. Zone A is the highest priority planning area given proximity to the intake and is defined as "the critical area of highest potential impact on the water supply, as proximity to the water supply's intake results in reduced response times and potential lower dilution and attenuation of a contaminant."

In recent years there have been a number of incidents at chemical facilities across the nation that have compromised the drinking water supply for thousands of Americans (such as the chemical spill on the Elk River in West Virginia and the fly ash spill on the Dan River in North Carolina). Locally, we experienced an oil spill in 2004, a fly ash spill in 2005, an industrial accident in 2006, and a vinyl chloride spill in 2012. We work with regulatory, environmental and industrial partners on an ongoing basis to demonstrate our commitment to having the necessary protections in place above our drinking water intakes.

What does Philadelphia Water Do to Prevent Contamination of Drinking Water?

Philadelphia Water has a number of monitoring programs to ensure the safety of our drinking water. The first step in a multi-barrier approach to maintaining a consistent, high quality drinking water supply is our nationally recognized Source Water Protection Program. Philadelphia Water's treatment facilities are among the best in the nation and have received industry and regulatory recognition, such as being awarded the Partnership for Safe Water Director's Award in both 1999 and 2008. Even with our award winning treatment facilities, Philadelphia Water believes in the multi-barrier approach to maintaining a high quality drinking water supply.

Why Does Philadelphia Water Take a Proactive Approach to Source Protection?

As previously noted, recent national water quality emergencies have resulted in contamination of water supplies, with the 2014 chemical spill in West Virginia being so severe that it left hundreds of thousands

of people without water service for over a week. Philadelphia Water has multiple emergency response capabilities designed to minimize the likelihood of such a severe outcome.

In the wake of these events, however, it is important for water utilities like Philadelphia Water to understand such incidents to ensure a proactive approach to emergency management. Our emergency response capabilities and protocols are routinely reviewed and enhanced to protect customers and maintain a reliable, high quality drinking water supply. Emergency response capabilities are also tested, most recently in 2012 when a train tanker released vinyl chloride into a tributary to the tidal Delaware River.

Philadelphia's location at the confluence of two heavily populated and industrialized rivers has necessitated Philadelphia Water to take proactive steps towards being an industry and regional leader in emergency preparedness.

Questions or comments about this issue? Please feel free to contact us a waterinfo@phila.gov