



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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July 8, 2008

Environmental Protection Agency
Water Docket, Mailcode:2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**Subject: EPA Proposed Rule – National Primary Drinking Water Regulations:
Drinking Water Regulations for Aircraft Public Water Systems (Docket No. EPA-
HQ-OW-2005-0025)**

Ladies and Gentlemen:

The Air Line Pilots Association, International, (ALPA) on behalf of our nearly 55,000 pilots at 40 U.S. and Canadian airlines would like to comment on proposed rule; “National Primary Drinking Water Regulations: Drinking Water Regulations for Aircraft Public Water Systems” (Docket No. EPA-HQ-OW-2005-0025). With this rulemaking, the Environmental Protection Agency (EPA) proposes to amend and consolidate in one place the federal drinking water requirements (National Primary Drinking Water Regulations or NPDWRs) for aircraft public water systems under the Safe Drinking Water Act.

ALPA feels it is important to assure that the potable water carried onboard passenger and cargo aircraft is of the highest quality and free from harmful contaminants that may affect the health of passengers and crewmembers. Onboard aircraft water systems are used in the lavatories for flushing, drinking, etc., and are also used for galley functions such as coffee preparation. Contaminated water has serious health implications.

The EPA tested 327 aircraft and found that 15 percent tested positive for total coliform. EPA embarked on a process to tailor existing regulations for aircraft public water systems. In the interim, EPA placed 45 air carriers under Administrative Orders on Consent (AOC). The air carrier AOCs combine sampling, best management practices, corrective action, public notification, and reporting and recordkeeping to ensure public health protection.

Under the Canadian Inspection Program, Health Canada randomly inspected 431 aircraft for microbiological presence in drinking water. Just as was found by EPA, of the aircraft inspected by Health Canada, over 15 percent tested positive for total coliform.

These studies certainly indicate that there is a problem with onboard aircraft water supplies and ALPA supports regulations to help assure their safety. While this proposed rule is certainly a step in the right direction, we have some concerns regarding it.

One concern is inadequate notification of crewmembers after a positive sample result. The rule proposes that notification will be from the time of the positive sample forward but persons who have already been exposed to contaminated water will not be notified. There should be a requirement that, at a minimum, crewmembers who have operated the affected aircraft for a certain period, at least 14 days prior to the failed test, be notified so they may monitor their health. As pointed out in the rulemaking proposal, one problem with determining the extent of problems with contaminated water supplies is lack of reporting. Passengers or crewmembers who may have been affected do not report illnesses because they may attribute an illness to general travel stresses or food/drink obtained during their travels, not necessarily to the aircraft water supply. Additional notification requirements may alert affected persons to report health problems that will help gauge the actual extent of problems with contaminated aircraft water supplies.

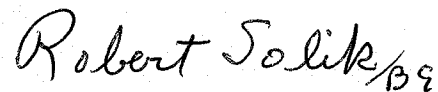
Another concern is that the proposed rule only requires air carriers to test for bacterial contamination, just like the AOCs. As a result, there is no information regarding the presence or implications of other contaminants. Sample testing should be required to determine the presence of other contaminants in addition to bacteria, such as other organic or inorganic compounds, etc.

The proposed rule does not address the issue of an identified problem with an aircraft water system. Problems may be identified by taste, smell, or color of the water or by passengers and/or crewmembers actually getting sick. Procedures such as water system analysis and provision of medical assistance must be included in the rule regarding handling an aircraft with an identified problem. Water system analysis must be required as soon as possible and provided to medical authorities who treat affected passengers and/or crewmembers.

With the inclusion of these provisions, we feel this will be a better rule.

Thank you for the opportunity to comment on the rulemaking.

Sincerely yours,

A handwritten signature in cursive script that reads "Robert Solik" followed by a small mark that appears to be a date or initials, possibly "1/31".

Captain Robert Solik, Chairman
Aeromedical Committee