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MEMORANDUM FOR NAVY OVERSEAS INSTALLATION WATER QUALITY BOARDS
(IWQB) AND REGIONAL WATER QUALITY BOARDS (RWQB)

Subj: DETERMINATION OF FIT FOR HUMAN CONSUMPTION AND PUBLIC NOTIFICATION FOR THE NAVY OVERSEAS DRINKING WATER PROGRAM

Ref: (a) CNICINST 5090.1, U.S. Drinking Water Quality Standards for Navy Installations, 4 February 2013
(b) Revised Handbook for Public Notification, U.S. Environmental Protection Agency, EPA 816-R-09-013, March 2010

Encl: (1) Fit for Human Consumption and Public Notification for the Navy Overseas Drinking Water Program

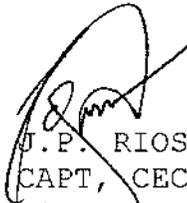
1. Enclosure (1) provides guidance to ensure consistent actions are taken to properly respond to drinking water quality issues. This effort assesses compliance with reference (a) and determines if a Navy overseas drinking water system is approved as fit for human consumption by meeting health based maximum contaminant levels (MCLs).

2. In order to implement consistent terminology, the Navy is adopting U.S. Environmental Protection Agency (EPA) term of "fit for human consumption" when referring to drinking water. A Navy overseas drinking water system is approved as fit for human consumption if it meets the required primary drinking water standards which are the health based MCLs as defined in host nation Overseas Environmental Baseline Guidance Document (OEBGD), Final Governing Standards (FGS), and reference (a). Demonstration of compliance will be verified through the submission of water quality compliance data, via the Overseas Drinking Water (ODW) database, to the IWQB and a record of decision made by the Installation Commanding Officer (ICO). This decision will be maintained on the ODW database and verified through site visits and inspections by the Regional Water Quality Board (RWQB) and the Water Quality Overseas Council (WQOC).

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NOTIFICATION FOR THE NAVY OVERSEAS DRINKING WATER PROGRAM

3. If water quality fails to meet a water quality standard, then public notification actions described in reference (b) shall be followed. When acute health effects exist with a water quality violation, the IWQB shall notify the ICO immediately. When the ICO decides the water is unfit for human consumption, an alternate water source shall be provided. A medical authority shall provide public health advice and consultation to the ICO and Installation Water Quality Board (IWQB) regarding water quality violations.

4. This guidance is effective immediately and is consistent with existing Navy Policy and U.S. EPA Public Notification Rule requirements. This memorandum will be superseded when its requirements are included in CNICINST 5090.3, "Navy Overseas Drinking Water Program."



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2 August 2013

1. **SUBJECT:** DETERMINATION OF FIT FOR HUMAN CONSUMPTION AND PUBLIC NOTIFICATION FOR THE NAVY OVERSEAS DRINKING WATER PROGRAM
2. **ISSUE:** The Navy Overseas Drinking Water (ODW) Program lacks consistency in requirements and execution of Public Notification and the authority to determine or declare a drinking water system fit for human consumption. Guidance is needed to ensure consistent actions are taken, consistent terminology is utilized, and authorities are understood to properly respond to drinking water quality issues.
3. **BACKGROUND:** The Overseas Water Quality Oversight Council (WQOC) is implementing use of the term "fit for human consumption" vice "potability" for water quality policy matters. Fit for human consumption is a term used officially by the U.S. Environmental Protection Agency (EPA) and it means that the water is safe for drinking, cooking, bathing, showering, dishwashing, and maintaining oral hygiene. Use of the term "potability" creates confusion mainly because it is not used consistently. Currently the Overseas Environmental Baseline Guidance Document (OEBGD) and Final Governing Standards (FGSs) define "potable water" as water that has been examined and treated to meet the drinking water standards as defined in the respective documents, and approved as potable by the appropriate DoD medical authority. Although the definition is found in established policy there is no follow-on requirement or criteria in those documents that discuss the process to approve the water as "potable" or allow it to be used for specific purposes. Approval of alternative water sources is addressed in the drinking water chapter of these standards by stating that the Installation Commanding Officer (ICO) has the responsibility to approve alternative water supplies. This guidance is insufficient to address all related situations (e.g., approving new systems versus old systems).
4. **PROCEDURE:**
 - a. An ODW system is "fit for human consumption" if it meets the required primary drinking water quality standards, which are the health based Maximum Contaminant Level (MCL) requirements, as defined in FGS, OEBGD, and CNICINST 5090.1. This statement aligns with U.S. EPA regulations and Navy policy, and is applicable to installation water systems regardless of whether an installation water system produces or purchases water for human consumption.

- b. Installations must submit water quality data to the Overseas Drinking Water (ODW) database for review by the Installation Water Quality Board (IWQB), chaired by the ICO, and the ICO certifies the system as fit for human consumption based on consultation and recommendation of the IWQB.
- c. This decision to declare water fit for human consumption shall be documented and uploaded to the ODW database as a Record of Decision for Water Quality.
- d. An ODW system is not "fit for human consumption" if it does not meet the required primary drinking water quality standards, which are the health based Maximum Contaminant Levels (MCLs)
- e. All new systems or systems that use a new source of water that began operation after February 4, 2013 must demonstrate compliance with the CNICINST 5090.1 MCLs within a period of time specified by the WQOC. The recommended period is two quarterly cycles for groundwater and four quarterly cycles for surface water. The system must also comply with the initial sampling frequencies specified by the host nation FGS and OEBGD to ensure a system can demonstrate compliance with the MCLs. Routine and increased monitoring frequencies shall be conducted in accordance with the requirements of the OEBGD/FGS/CNICINST 5090.1.
- f. If an installation water system does not meet the required primary drinking water standards, thus exceeding the established MCLs, and resulting in a non-compliance, the installation must implement the EPA 3-tier public notification process as defined in the Revised Handbook for Public Notification Process, EPA 816-R-09-013, which is implemented as Navy policy. This does not obviate the existing requirement to meet FGS, OEBGD, and International Agreement requirements for public notification.
- g. At a minimum the following communication should be followed to identify a system as "fit for human consumption":
 - i. The ICO must consult with his/her IWQB members - specifically environmental, medical, and utilities at a minimum and obtain their recommendations based on documented evidence of compliance with drinking water standards (i.e., sampling and analysis results and records). The recommendation from the medical authority would also need to be considered an "approval" of their analysis of the quality of the water for human

- consumption, in order to comply with the FGS/OEBGD Chapter 3 requirements.
- ii. After IWQB consultation, the ICO must inform the RWQB, and the RWQB must inform the WQOC. Both the RWQB and WQOC have the authority to review and advise on the situation, as needed.
 - iii. Upon receipt of the consultation / recommendations from the IWQB, the ICO has the authority to make the determination of fit for human consumption for the installation and must document the decision and post that record of decision to the ODW database.
 - iv. If the WQOC or RWQB desires to make a determination contrary to the ICO recommendations, the matter will be taken to the Navy Executive Agent for Drinking Water Ashore for adjudication.
- h. The only exception to bypassing the communication process described in steps i-iv above would be in matters of immediate public health concern, for which the Operator in Responsible Charge (ORC), Public Works Officer (PWO), ICO and/or Region Commander (RC) have the authority to take immediate, effective emergency actions, depending on the urgency of the situation. These would be for Tier 1 notifications which require 24 hour notification. Consultations as described above must still take place once the emergency response is underway.
- i. Implementation of the EPA 3-tier public notification process for the Navy overseas will establish clear, consistent guidelines that put overseas installations on par with US requirements. Establishing the ICO as the authority to determine ODW systems fit for human consumption helps fill part of the oversight regulatory oversight void and provides clarity on the policy throughout the Navy. These are two more important steps toward ensuring Navy personnel "receive the same quality of drinking water at overseas installations as in the United States" per SECNAV guidance.
- j. The Navy ODW Program will provide input on the use of the term "potable" in the OEBGD and FGS as part of the normal OEBGD update process.