



June 7, 2016

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Environment and Climate Change Canada / Government of Canada

RE: CWWA Concerns and Comments on new Reporting under the NPRI

CWWA's Wastewater and Stormwater Committee has reviewed the proposed reporting of contextual information under the National Pollutant Release Inventory.

We understand that this information could help add context to existing reporting, by explaining how concentration levels were reached and demonstrating the uncertainty around them. This will certainly benefit our members, as the reporting, especially where made based on emission factors or other less direct means, is frequently misinterpreted by the public and media. However, we do have some concerns regarding the proposed mechanism and concept itself.

General Comment

When we discussed the proposal and the reporting of "half the detection limit" we discovered that this advice, as set out in the guidance is not being followed consistently in our sector. If a substance isn't detected, some utilities interpret these results as being adequate to demonstrate that it isn't present. The guidance recommends reporting half the detection limit if it is reasonable to assume it's present above the reporting threshold, despite it not being detected. This seems like a completely arbitrary and qualitative determination that is likely providing inconsistent and meaningless data to the NPRI. Allowing us to specify in our reporting that that is how the concentration is reached, is a step in the right direction, but still somewhat meaningless in terms of providing useful and meaningful data. The practice of multiplying half the detection limit by the discharge also gives results skewed against large utilities – especially when compared to cities with several treatment plants, instead of one large one.

Specific Proposed Reporting Comments

1. "Information on Sampling and Detection limits for Release" is not applicable to all of the options in the Basis of Estimate drop down menu, so there should also be a NA-Not Applicable option in the second drop down menu referring to "Information on Sampling and Detection Limits for Release:"

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2. The proposed reporting would require the method detection limit be reported. The method detection limit is not static throughout the annual reporting cycle as it is influenced by several factors connected to the sample itself, the matrix effect or even changing analytical methods. Requiring an average would add to the already significant administrative burden for our members. Our Committee recommended that perhaps this information could be restricted to just those substances with alternate reporting thresholds.
3. A drop down menu for units would be much easier than having to convert all of our detection limits to ppm for those of us who have multiple substances to report for (e.g. wastewater treatment plants). Most of the water concentration data for NPRI reportable substances is typically reported by laboratories in µg/L (ppb) or ng/L (ppt) and occasionally mg/l (ppm) or pg/L.

For both documents:

4. Concentrations expressed as ppm are not easily interpreted as this unit does not automatically indicate whether the measurements refer to solutions or solids (see table below) and they are not part of the International System of Units. We do not suggest a list of “part per x (ppx)” as they can cause misunderstanding in interpreting results because, for example, the value for “billion” is either 10 to power of 12, or 10 to the power of 9 depending on the country, while “ppt” can mean “parts per trillion”, or “parts per thousand”.

Suggestion to avoid future confusion in interpreting NPRI data, provide a drop down menu with metric system units.

Unit	Solutions		Solids	
ppm	mg/L	µg/mL	mg/kg	µg/g
ppb	µg/L	ng/mL	µg/kg	ng/g
ppt	ng/L	pg/mL	ng/kg	pg/g

5. We suggest consistent options for all tabs.

Thank you for your consideration

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(on behalf of CWWA's Wastewater and Stormwater Committee)

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