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From: Duncan.Rose@ghd.com

To: Edward Hanlon/DC/USEPA/US@EPA

Date: 07/16/2009 08:20 PM

Subject: Re: Fw: Public comments to the July 21-22 EPA SAB consultation on Aging Water Infrastructure

Thanks, Ed. Yes, let's please remove the original public comments and the accompanying documents.

I would submit the following comment instead:

Improving the cost effective management of aging and deteriorating buried infrastructure is a major agenda item for many other water industry organizations around the world (eg, WERF, Water Research Foundation, UKWIR, GWRC, IPWEA, ARC, CSIRO, IWA to name a few). Excellent work has recently been done or is currently underway in the systematic advancement of our understanding of the causes of failure in buried pipe, how to more cost effectively assess the condition of pipe, and how to more accurately predict remaining physical life. I would urge EPA to continue its strategy of building on this body of work in an internationally collaborative manner so as not to "reinvent" work already accomplished elsewhere. Rather, I would hope we would invest our limited research budgets in collaboratively advancing the level of practice (from the perspective of the practitioner) in renewal investment decision making in our water utilities. Much of the international work is lies in the materials sciences realm; arguably, even more needs to be done in the practical integration of what we are learning in the physical sciences about pipe failure modes and mechanics and the prediction of failure with the decision sciences/micro economics so that a much higher level of uptake occurs in day to day investment decision making.

Regards,

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