N-NITROSODIMETHYLAMINE (NDMA)

Comments on the **environment-related** sections of the CEPA PSL Draft Assessment Report on NDMA were provided by

1. Ontario Ministry of the Environment, Toronto, Ontario
2. Canadian Water and Wastewater Association, Ottawa, Ontario

Comments and responses are summarized below by Environment Canada.

Comment[(submitter)]	Response
Identification of typographical and editorial errors in report [(1)].	The changes suggested will be incorporated into the final assessment report.
While the CWWA agrees that the potential exposure from sewage sludge should be examined, its significance, however, must be carefully evaluated as the bioconcentration factor is not applicable as biota can generally biotransform NDMA. Due to cost issues, CWWA recommends that any requirements to monitor sewage sludge include provision to establish site-specific sampling frequencies, ranging from an annual sample to a maximum quarterly sampling frequency. This should be based on the results of establishing a baseline level for NDMA in sludge in a given community[(2)].	This comment will be forwarded to risk managers for their information.

N-NITROSODIMETHYLAMINE (NDMA)

Comments on the **health-related** sections of the CEPA PSL Assessment Report on NDMA were received from Stéphanie McFadyen (Canadian Water and Wastewater Association, Ottawa, Ont), the Federal-Provincial Subcommittee on Drinking Water) submitted by the secretary, Dave Green (Drinking Water Quality Program, Health Canada, Jonathon Busch (Chemical Manufacturers Association), and Dennis Maroni (SNF-Floerger, Saint-Etienne, France). All comments related to the statement within the Synopsis and section on Consideration for Follow-up of the NDMA PSL Assessment Report that "*Optimization of drinking water treatment to minimize formation of NDMA is also recommended. In particular, the suitability of the use of the specific preblended polyamine/alum water treatment coagulant identified to be contributing to levels of NDMA in drinking water in Ontario should be considered."*

Comment	Response
It was suggested that it was inappropriate for the CEPA PSL assessment report to include such a statement, since NDMA (in drinking water) is not considered a national priority for evaluation by the Federal-Provincial Subcommittee on Drinking Water, and that it is only this Sub-committee that should develop recommendations concerning methods for the disinfection of drinking water supplies in Canada.	The Priority Substances were selected following recommendations to the Ministers by an expert multistakeholder Advisory Panel based on potential for both exposure and effect in Canada. In the assessments, these substances are considered from the perspective of exposure in all media, including drinking water. Hence, it is anticipated that recommendations from this program would be considered by the Sub-committee on Drinking Water in its priority setting exercises.
It was suggested that the inclusion of any statement concerning the "Optimization of drinking treatment to minimize formation of NDMA…" also include a statement to the effect that the implementation of any change to the processes for the disinfection of drinking water supplies (to reduce levels of NDMA), must never compromise human health protection.	The statement in the PSL report was changed to *Optimization of drinking water treatment to minimize formation of NDMA is also recommended, though such measures must not compromise human health protection".*
Data were submitted as a basis for the contention that polyamines and polyamine/alum blends are not likely to represent a significant source of NDMA in drinking water supplies. However, it was also noted by another commentor that it would be useful for manufacturers	The data and the suggestion have been passed to the risk managers for consideration, in collaboration with relevant authorities (i.e., the Sub-committee on Drinking Water) in the subsequent risk management phase.

Comment	Response
providing products to the drinking water sector to provide some assurance that their products do not contain NDMA above specified levels, and will not result in NDMA formation following chlorination.	