SDW Technical Guidance
Revisions
Small Water Systems TAC Meeting
March 29, 2018

Tom Wolf, Governor
Patrick McDonnell, Secretary
Field Related Compliance

**Existing** Technical Guidance Document

**Title:** Safe Drinking Water Program Field-Related Compliance

**Effective Date:** October 3, 1997

**Document No.:** 383-3000-101

**Purpose:** To establish a rational & reasonable basis for staff decisions which will promote quality, timely and consistent service to the regulated community
**Field Related Compliance**

*Existing* Technical Guidance Document

**Content:**

- Classification & Response for each violation type:
  - Imminent Threat Violations
  - Priority Violations
  - Management / Administrative Violations

- Attachments include suggested field order language and mandatory health effects language
Content:

- Detail on each of the violation types
  - Imminent Threat Violations (A1, A2, and A3)
  - Priority Violations (B)
  - Operational/Administrative Violations (C, D & E)

- Significant Deficiencies
  - Table: Significant Deficiency Examples
  - Compliance Milestones for Significant Deficiencies
Revised Draft Technical Guidance Document

Content Continued:

• Appendix A:
  – Proper Completion of a Field Order
  – Suggested Field Order Language for Imminent Threat and B6 Priority Violations

• Appendix B:
  – Field Order Examples
**Revised** Draft Technical Guidance Document

**Changes/Additions:**

- Clarification of imminent threat violations
  - Specify which violations are A1, A2, or A3
- Addition of Significant Deficiency section
- Changed title of “Management” violations to “Operational” violations to be consistent with other SDW guidance documents
Revised Draft Technical Guidance Document

Changes/Additions:

- Addition of Field Order completion instructions and Examples
  - To promote statewide consistency for issuance of field orders among drinking water field staff

- Deletion of mandatory health effects language
  - Contained within EPA regulations (40 C.F.R Part 141, Subpart Q, Appendix A)
SDW Field Related Compliance

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**Key Requirements for TNCWSs**

Transient Noncommunity Water System (TNCWS)

- A public water system that does not meet the definition of a community or nontransient noncommunity water system
  - Public Water System: A facility that regularly serves an average of 25 people or 15 service connections at least 60 days per year
  - TNCWS examples include restaurants, churches, convenience stores, golf courses, parks & campgrounds
Key Requirements for TNCWSs

• Relevance of the *Key Requirements* document
  – Of the 8,400+ active PWSs in Pennsylvania, more than 5,200 (i.e. 62%) are TNCWSs
  – All but 30 TNCWSs rely solely on groundwater

• Focus of the *Key Requirements* document
  – TNCWSs approval process
  – Monitoring & Reporting Requirements
  – Secondary Contaminants
  – Public Notification
  – Record Maintenance
Key Requirements for Transient Noncommunity Water Systems (TNCWSs)

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PWS Manual Part IV - NCWS Standards

• PWSM Part IV design standards apply to Noncommunity Water Systems (NCWSs)

• NCWSs include both *nontransient and transient* water systems (e.g. schools, hospitals, restaurants, hotels, churches)

• NCWS are different from a CWS
  – Ownership, management, occupancy, type, & size change more frequently
  – Go in and out of existence fairly quickly
  – Pre-existing NCWSs are still actively being identified
PWSM IV objective is to ensure that new or substantially modified NCWS will be capable of producing an adequate supply of potable water that is in compliance with applicable regulations.

Update goals:

- Be consistent with new regulations
- Clarify and simplify existing standards
- Provide a detailed plan for approval processes
- Streamline approval process while being protective of public health
PWS Manual Part IV - NCWS Standards

• PWS Manual Part IV has not received any major revisions since March of 1998

• Design standards do not match current regulations

• Design standards do not match current technology
PWS Manual - Part IV
Noncommunity Water System Design Standards

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Lead & Copper Rule (LCR) is intended to control lead & copper levels in PWSs through a treatment technique for corrosion control.

LCR Treatment Technique requirements:

- Optimal Corrosion Control Treatment (CCT) to minimize lead & copper levels at users’ taps while ensuring the treatment does not cause other MCL violations.
- Lead Service Line (LSL) replacement.
- Lead Public Education (PE).
• *Existing* technical guidance document that is a comprehensive guide describing the LCR requirements

• Each section begins with a small/medium water system flow chart that serves as a roadmap
  – Highlighted topics are found in the section
  – Section numbers are in the upper right corner
Revised technical guidance document includes regulatory revisions through 2010 and revised EPA guidance through 2016

- Materials evaluation and new LCR Sample Site Plan template information and link
- Consumer tap notice of lead results
- 2016 EPA revised lead & copper tap sample collection procedures
- Lead PE content and delivery revisions
Link to EPA’s 2016 OCCT Manual
- Systems must optimize CCT at all times
- Changes in source water or treatment must be approved by DEP *prior* to making the change

Link to the NTNCWS PE poster and pamphlet

Partial (LSL) replacement requirements

Include LSL sites below the lead action level (i.e. replaced through testing) back into the LSL inventory for sampling sites
LCR Working Guide Updates

• Water Quality Parameter (WQP) compliance determinations
• Revised annual and triennial lead & copper tap monitoring criteria
• Nine year lead & copper tap monitoring waiver requirements for PWSs
• Large PWS reduced WQP monitoring revocation
• Revised operator certification requirements to clarify need for subclass 7 certification
Lead and Copper Rule (LCR) Working Guide

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WQP Reporting Instructions

• New technical guidance

• WQPs referenced in the 2008 *Laboratory Reporting Instructions for Lead & Copper under the LCR*

• This guidance provides uniform, detailed instructions for the reporting of WQP monitoring results to DEP

• Laboratories and PWSs must report data electronically through DWELR
WQP Reporting Instructions

• WQPs include:
  – Alkalinity, calcium, conductivity*, temperature*, pH, and, if an inhibitor is used, silica or orthophosphate
  – (*These parameters are not required after CCT has been installed)

• WQPs are used to identify optimal CCT and determine if the system is in compliance with the LCR
• Large systems and those small/medium systems that exceed an Action Level are required to monitor for WQPs

• Specific WQP requirements are based on whether or not the PWS has installed CCT to address a lead and/or copper exceedance
Water Quality Parameter (WQP) Reporting Instructions for the Lead & Copper Rule

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