“Policy for Determining When Loss of Positive Pressure Situations in the Distribution System Require One-Hour Reporting to the Department and Issuing Tier 1 Public Notification”

– Doc. No. 393-2129-003
– Effective date October 3, 2009
– Purpose: “...to establish uniform instructions and protocol for responding to loss of positive pressure situations in the distribution system to ensure the protection of public health.”
• Clarifies when one-hour reporting to DEP is required in conjunction with a LOPP situation:
  1. If the loss of positive pressure is caused by something *other than* a main break
     • i.e. power outage, pump failure, source outage, depletion of storage
  2. If the loss of positive pressure is caused by a main break, repair, or replacement, *AND* there is either:
     • Evidence of contamination, *OR*
     • High risk of contamination
  3. Repairs to a break are not completed per AWWA Standard C-651
  4. E.coli positive special samples
LOPP Policy – Overview

• Consultation regarding the potential need for Tier 1 PN (BWA) also required
  – Refer to the Policy for Issuing and Removing Water Supply Warnings

• PWSs must follow Best Management Practices:
  – ANSI/AWWA Standard C-651
  – AWWA field guide “Disinfection of Pipelines and Storage Facilities”
LOPP Policy – Overview

• Best Management Practices checklist
  – Summarizes key points of C-651:
    1. Minimize entry of contaminants
    2. Disinfect the pipe
    3. Remove contaminants and dechlorinate discharge
    4. Determine effectiveness of procedures
       – Microbiological sampling guidelines
       – Criteria that must be met in order to avoid sampling
    5. Complete recordkeeping
Summary of key edits

Draft edits

- Removed references to a specific version of AWWA Standard C-651
  - C-651-05 refers to the revision year 2005
  - Current edition is C-651-14 (revised in 2014)
  - Replaced with “most recent edition” to avoid the need for future revision of the policy
Summary of key edits

• Added language clarifying why LOPP caused by something other than a main break requires one-hour reporting
  – Widespread impacts
  – Increased likelihood of potential pathways of contamination
  – Extremely difficult to fully evaluate in order to rule out risk of contamination
• Clarification that a properly certified Class E operator must make process control decisions
  – Including determination whether evidence or high risk of contamination exists
  – On site if possible, or available by phone at a minimum
  – If a properly certified Class E operator is not available to evaluate the situation, it is assumed to be high risk for contamination
Summary of key edits

• Clarification that all portions of distribution system need to be evaluated for LOPP
  – “any portion of the distribution system”
  – Includes low pressure zones or high elevations, even if located outside of the immediate area surrounding the break
Summary of key edits

• Reiteration that 109.711 requires PWSs to follow AWWA procedures
  – Must have access to and follow C-651
  – At a minimum, ensure that staff and/or contractors conducting repairs have access to and follow the standard
Summary of key edits

• Clarified the need to re-evaluate during the situation for loss of pressure and the need for 1-hour reporting
  – If LOPP discovered during event, evaluate to determine whether 1-hour reporting applies
  – Time clock for 1-hour reporting begins upon determination
Summary of key edits

• New Section E. Special Considerations
  – Includes criteria to avoid collection of bacteriological samples
  – Removed from Section D (best management practices summary) because these criteria are not included as part of C-651
Questions?

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