



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Safe Drinking Water

Loss of Positive Pressure (LOPP) Policy Draft Revisions

Small Water Systems TAC Meeting

January 31, 2019

Tom Wolf, Governor

Patrick McDonnell, Secretary

LOPP Policy

“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.”

LOPP Policy – Overview

- 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

Summary of key edits

- 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



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Safe Drinking Water

Questions?

Jill Anderson

jianderson@pa.gov

717.772.4049