

Minutes of the January 31, 2019 Meeting
Small Water Systems Technical Assistance Center (TAC)
Advisory Board

A regular meeting of the TAC Board was called to order by Chairperson Serena DiMagno at 9:15 AM in Room 105 of the Rachel Carson State Office Building. The purpose of the meeting was to review and discuss pre-draft technical guidance documents developed for the Disinfection Requirements and General Update Rules.

The following Board members were present:

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)
Robert Boos, Pennsylvania Infrastructure Investment Authority (PIIA) – *via webinar*
Doug Crawshaw, American Water Works Association (AWWA)
Serena DiMagno, Water Works Operators Association of Pennsylvania (WWOAP)
Jack Gombach, Pennsylvania Association of Realtors (PAR)
Christine Maloni Hoover, Office of Consumer Advocate (OCA)
Penny McCoy, Pennsylvania Rural Water Association – *via webinar*
Mary Roland, State Board for Certification of Sewage Treatment Plant and Waterworks Operators (SBCSTPWWO) – *via webinar*
James Steele, Pennsylvania Builders Association (PBA)

The following Alternate members were present:

Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP) – *via webinar*
Christine Caldara Piatos, Center for Rural Pennsylvania (CRP)
Jennifer Case, Pennsylvania Municipal Authorities Association (PMAA)
Lisa Daniels, Pennsylvania Department of Environmental Protection (DEP)
Ashley Everette, Office of Consumer Advocate (OCA) – *AM only*
Mary Gaiski, Pennsylvania Manufactured Housing Association (PMHA)
Seth Loht, RCAP Solutions – *via webinar*
Clint McKinley, Pennsylvania Public Utility Commission (PUC)
Larry Miller, Pennsylvania Builders Association (PBA)
Curt Steffy, State Board for Certification of Sewage Treatment Plant and Waterworks Operators (SBCSTPWWO)

The following Organizations were not represented:

County Commissioners Association of Pennsylvania (CCAP)
League of Women Voters, Pennsylvania
Pennsylvania Association of Conservation Districts, Inc. (PACD)
Pennsylvania Department of Community & Economic Development (DCED)
Pennsylvania State Association of Township Supervisors (PSATS)

Members/alternates from 14 organizations were present; therefore, a quorum was achieved.

The following Department of Environmental Protection (DEP) staff were present:

Jeff Allgyer, Bureau of Safe Drinking Water
 Jill Anderson, Bureau of Safe Drinking Water
 Kevin Anderson, Bureau of Safe Drinking Water
 Tom Barron, Bureau of Clean Water
 Justin Blashaw, Bureau of Safe Drinking Water
 Brian Chalfont, Policy Office

Sean Gimbel, Office of Water Programs
 Sabrina Haydt, Bureau of Safe Drinking Water
 Dawn Hissner, Bureau of Safe Drinking Water
 Matt Kundrat, Bureau of Clean Water
 Rod McAllister, Bureau of Clean Water
 Bill McNamara, Bureau of Safe Drinking Water

Non-Members present at the meeting:

Carolyn Hathaway, Aqua PA Water Co.
 Frank Medora, Aqua PA Water Co
 Tim Bartrand, ESPRI
 Rachel Gleason, Pa Coal Alliance
 Jennie Shade, PMAA
 Bill Murray, Reading Area Water Authority
 Kim Mazur – *via webinar*
 Helen Piccone – *via webinar*

Alison Aminto, Philadelphia Water Department
 Matthew Fritch, Philadelphia Water Department
 Dennis O'Connor, Philadelphia Water Department
 Will Whalon, Philadelphia Water Department
 Wanda Rios Martinez, RCAP Solutions
 Matt Walborn, Western Berks Water Authority
 Christine Swailes, Suez Water – *via webinar*

General Advisory Board business:

One item of general business was discussed:

The draft minutes from the Nov 9, 2018 TAC Board meeting were presented for discussion. One edit (noted in *italics & underline*) was requested to this sentence:

“If an unregulated contaminant is detected above a HA level at the entry point, the PWS must notify DEP within 1-hour of discovery of the results, regardless of whether the monitoring is voluntary or required (such as for UCMR)”.

Doug Crawshaw (AWWA) made a motion to approve the Nov 9, 2018 minutes with the edit; Jim Steele (PBA) seconded the motion. The motion passed by a unanimous vote.

Proposed Manganese (Mn) Water Quality Standard

Staff from the Water Quality Standards Section in the Bureau of Clean Water (BCW) presented an overview of proposed changes to the Water Quality Standard for Manganese.

BCW is requesting comments be submitted to Tom Barron by Feb 28, 2019. This is not an official comment period – this is just an opportunity to provide stakeholder comments prior to the development of the proposed rulemaking. The comments should focus on:

- Simultaneous compliance issues, water quality impacts, economic impact.
- What level of manganese can be delivered to the PWS intake that can be treated by “conventional” plant process(es) to meet the Mn secondary MCL. What additional treatment would be needed & at what costs?
- BCW is also requesting any data on source water Mn levels.
- Suggestion from TAC to add notification requirement to proposed rule so that facilities with NPDES discharge permits to notify downstream users of discharge permit limits.

Loss of Positive Pressure Policy (LOPP) Revisions

- TAC suggested that the document clarify whether C651 requires coliform samples within new pipe segment and/or for main break repairs (on page 9).
- DEP reminded the Board that there will be a formal comment period when the document with the draft revisions is published.

Draft Uninterrupted System Service Plan (USSP) forms

- Additional edits were made based on comments received from TAC and water systems. It was noted that the dates on page 10 are incorrect (should be 2020, 2021 and 2022).
- Clarification that USSP provisions apply only to community PWSs because most noncommunity PWSs have the option to close if there is a water outage.
- A question was posed that if a small PWSs waits until they have is a power outage before they obtain a generator – would this be acceptable under USSP? DEP responded that it would depend on the practicality of obtaining and setting up a generator based on the available storage for that PWS.
- DEP will consider creating an alternate form for water systems with a large number of critical facilities.
- USSP training will be included with training on the General Update provisions.

Nitrification Control Plan

TAC provided the following comments:

- Include explanation for nitrification; clarify what is required by regulation vs. what are the suggested parameters (throughout form).
- Additional clarification should be included to ensure DEP staff will not misinterpret the examples for monitoring parameters as being required set points or trigger levels.
- Additional clarification is needed on DEP expectations for water systems that do not have their own chloramination booster treatment.
- Should not suggest a free ammonia goal of zero (should be “minimal”).
- Training on form should discuss importance of valid data for process control testing (analytical methods, detection limits, etc.).
- Comments from the public:
 - Clarify template is optional form, not mandatory.
 - Nitrate is not a useful parameter for nitrification control.

Filter Bed Evaluation Program (FBEP) Form

DEP clarified that this document is a form; it is not technical guidance. Use of this form is not required, but the PWS must document that they have a program that has equivalent content/components. The FBEP does not require corrective actions or dictate process control decisions but was intended to increase the frequency of data gathering to identify problems before water quality is affected.

TAC provided the following comments:

- The regulatory citation should be included.
- DEP clarified that this form applies to filter plants using rapid rate filtration –water suppliers need to follow manufacturer’s (and industry) best management practices for other filtration technologies (pressure filters, membrane filtration, etc.).
- This is burdensome and not practical for plants with a large number of individual filters – the frequency of the evaluation should be based on performance data.
- This form should be part of General Update training.
- Clarify what flexibility is allowed on the frequency of individual filter evaluations and whether the PWS may use a representative number of filters in lieu of evaluating every filter cell.
- Clarify requirements (vs. recommendations) for Partnership plants.

Adjourn

Doug Crawshaw made a motion to adjourn. The motion passed by a unanimous vote, and the meeting adjourned at 2:30 PM.