

Minutes of the August 24, 2017 Meeting
Small Water Systems Technical Assistance Center (TAC)
Advisory Board

A regular meeting of the TAC Board was called to order by Vice-Chairperson Robert Boos at 9:00 AM in Room 105 of the Rachel Carson State Office Building. The purpose of the meeting was to discuss the draft final-form Disinfection Requirements Rule regulation language (Annex A) and finalize TAC's comments.

The following Board members were present:

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)
Robert Boos, Pennsylvania Infrastructure Investment Authority (PIIA)
Stan Brown, Pennsylvania Public Utility Commission (PUC)
Doug Crawshaw, American Water Works Association (AWWA)
Lauren Gross, Pennsylvania Association of Realtors (PAR) – *morning only*
Penny McCoy, Pennsylvania Rural Water Association (PRWA) – *via webinar*
Mary Roland, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)
James Steele, Pennsylvania Builders Association (PBA)

The following Alternate members were present:

Dennis Beck, Pennsylvania Association of Conservation Districts, Inc. (PACD)
Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP)
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/Erin Gannon, Office of Consumer Advocate (OCA)
Sharon Fillmann, American Water Works Association (AWWA)
Mary Gaiski, Pennsylvania Manufactured Housing Association (PMHA)
Mike Kelly, Pennsylvania Department of Community & Economic Development (DCED)
Larry Miller, Pennsylvania Builders Association (PBA)
Curt Steffy, State Board for Certification of Sewage Treatment Plant and Waterworks Operators (SBCSTPWWO)
James Wheeler, Pennsylvania State Association of Township Supervisors (PSATS)

The following Organizations were not represented:

County Commissioners Association of Pennsylvania (CCAP)
League of Women Voters, Pennsylvania
RCAP Solutions
Rural Utilities Services (RUS)

Members/alternates from 16 organizations were present; therefore, a quorum was achieved.

The following DEP staff were present:

Kevin Anderson, Bureau of Safe Drinking Water
Ed Chescattie, Bureau of Safe Drinking Water
Dawn Hissner, Bureau of Safe Drinking Water

Hayley Jeffords, DEP Policy Office
Nichole McDannell, Bureau of Safe Drinking Water
Joanne Nardone, Bureau of Safe Drinking Water

Non-Members present at the meeting:

Frank Medora, Aqua Pennsylvania
Kristine Kevismar, Lehigh County Authority
Gretchen Schleppey, Lehigh County Authority
Scott Sharp, PA American Water
Rita Kopansky, Philadelphia Water Department

Dennis O'Connor, Philadelphia Water Department
Christine Swailes, Suez Water
Matt Walborn, Western Berks Water Authority
Erik Ross, Milliron & Goodman

General Advisory Board business:

Three items of general business were introduced prior to new business:

- Robert Boos (replacing Brion Johnson) and Amy Batdorf (replacing E. Lee Koch) are acknowledged as the new members for PIIA and PMAA respectively. PIIA will need to appoint a new alternate.
- The October 26, 2017 meeting will be rescheduled for November 16, 2017.
- The draft minutes from the July 13, 2017 TAC Board meeting were presented for discussion. Lauren Gross (PAR) made a motion to approve the July 13, 2017 minutes as presented; Stan Brown (PUC) seconded the motion. The motion passed by a unanimous vote.

Public Comments

- No comments were received from the members of the public in attendance.

TAC Board Discussion of draft Final-form Annex A – Disinfection Requirements Rule

Discussion continued on the draft final-form Annex A language and the informal comments received and distributed to TAC members/alternates.

- Mixing zones are dynamic and do not have discreet boundaries. Additionally, systems using chloramination that conduct free chlorine burns will also have mixing zones during the period of the free chlorine burn.
- Both free and total residuals would need to be reported for systems conducting a free chlorine burn; the higher value should be used for compliance determinations.
- The small system compliance monitoring should be kept at the weekly frequency. The Annex A language should clarify what data is reported & used for compliance if on-line analyzers are used for distribution system compliance monitoring.

TAC Board Comments on draft Final-Form Disinfection Requirements Rule

NOTE: Lauren Gross (PAR) and Mike Kelly were not present for this portion of the meeting. Therefore, there are 14 organizations counted in the voting on the following comments.

- Mary Roland made a motion that DEP should allow flexibility in the regulation for water systems to define the boundaries of mixing zones to account for dynamic operating conditions. The motion was seconded by Doug Crawshaw. However, the motion was withdrawn after the discussion (before a vote was recorded).
- Chip Bilger made a motion that DEP should modify the proposed language to identify whether the distribution system disinfection sample site is located within the mixing zone. The motion was seconded by Dennis Beck. The motion passed by a unanimous vote.
- Mary Roland made a motion that DEP should modify the distribution system disinfection language to address monitoring locations and compliance calculations for mixing zones and for chloraminating systems conducting a free chlorine burn. The motion was seconded by James Wheeler. The motion passed by a unanimous vote.
- Doug Crawshaw made a motion to keep the entry point chlorine residual level at 0.2 mg/L instead of the proposed 0.20 mg/L. The motion was seconded by Mary Roland. However, the motion was withdrawn after the discussion (before a vote was recorded).
- Chip Bilger made a motion that DEP should add language to clarify that multiple grab sample measurements from the same location during the monitoring period will be averaged by DEP into a monthly compliance value for that location. The motion was seconded by Mary Roland. The motion passed by a unanimous vote.
- Chip Bilger made a motion that water systems using continuous analyzers for distribution system disinfection residual measurements as described in their monitoring plan should calculate a daily average that is reported to the Department. The motion was seconded by Mary Roland. The motion passed by a unanimous vote.
- Chip Bilger made a motion that DEP should allow alternate compliance schedules (regarding the compliance date for the distribution system disinfection minimum level) to be approved in writing if the water supplier submits a written request with supporting documentation within 1 year after the effective date of the final rule. The motion was seconded by Mary Roland. The motion passed by a unanimous vote.
- Mary Roland made a motion that the distribution system disinfection level number should be changed to 0.1 mg/L from the 0.2 mg/L as originally recommended by TAC in July 2015. The motion was seconded by Larry Miller. The vote was recorded as follows:

Organization	Vote	Organization	Vote	Organization	Vote
DEP	No	PMHA	Yes	PUC	No
PRWA	No	PSATS	Yes	PIIA	No
PMAA	Yes	OCA	No	SBCSTPWWO	Yes
AWWA	Yes	PACD	No	CRP	No
WWOAP	Yes	PBA	Yes		

The vote was a 7 to 7 tie; therefore, the motion failed to pass.

- Mary Roland made a motion that DEP should delay any new regulation update on Chapter 109 until the Safe Drinking Water Program is at full complement and current regulations are uniformly enforced. The motion was seconded by Dennis Beck. The vote was recorded as follows:

Organization	Vote	Organization	Vote	Organization	Vote
DEP	No	PMHA	Yes	PUC	No
PRWA	Yes	PSATS	Yes	PIIA	No
PMAA	Yes	OCA	No	SBCSTPWWO	Yes
AWWA	Yes	PACD	Yes	CRP	No
WWOAP	Yes	PBA	Yes		

The motion passed by a vote of 9 to 5.

- Doug Crawshaw made a motion that the deadline for developing the nitrification control plan should be delayed for 1 year after the effective date of the final rule. The motion was seconded Chip Bilger. The vote was recorded as follows:

Organization	Vote	Organization	Vote	Organization	Vote
DEP	No	PMHA	Yes	PUC	Yes
PRWA	Yes	PSATS	Yes	PIIA	Yes
PMAA	Yes	OCA	No	SBCSTPWWO	Yes
AWWA	Yes	PACD	Yes	CRP	Yes
WWOAP	Yes	PBA	Yes		

The motion passed by a vote of 12 to 2.

- Sharon Fillmann made a motion that DEP should conduct a disinfection byproduct evaluation to determine the impacts of increasing the chlorine residual in the distribution system using data only from Pennsylvania water systems. The motion was seconded Mary Roland. The motion passed by a voice majority vote.
- Penny McCoy made a motion that DEP should retain the compliance calculations as proposed for water systems serving a population of 33,000 or less. The motion was seconded Dennis Beck. The motion passed by a voice majority vote (PBA voted No).

Adjourn

Amy Batdorf made a motion to adjourn. The motion passed by a voice majority and the meeting adjourned at 3:00 PM.