



July 3, 2014

Ms. Lisa Daniels, Director  
Bureau of Safe Drinking Water  
P.O. Box 8467  
Harrisburg, PA 17105-8467

Re: Comments of proposed RTCR and General update to Chapter 109

Dear Ms. Daniels:

The Small Systems Technical Assistance Center (TAC) Advisory Board met on June 18th, 2014 to review and discuss the Department's pre-draft proposed changes to the safe drinking water regulations, specific to the Revised Total Coliform Rule (RTCR) and including general updates to Chapter 109. We have the following comments:

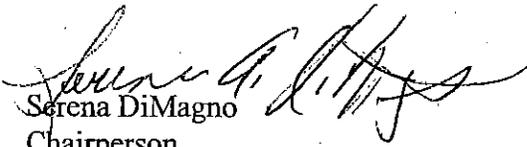
1. Regarding E. Coli positive results: the TAC Board would prefer the requirement of contacting DEP by the end of the day, as per the Federal requirement, instead of within one hour.
2. The TAC Board will tell the systems they represent that they can use the DEP 24-hour emergency number for required contact instead of calling their Sanitarian.
3. Some water systems will be negatively impacted by the restriction of only being able to use sampling locations once per month.
4. The word "representative" should be replaced when referring to sampling locations.
5. Options are needed to allow for alternate check sample locations.
6. Identifying specific addresses for check samples is unworkable for some water systems.
7. The word "available" should remain in the regulation language regarding check sample locations.
8. The regulations should include examples of situations when DEP would require a water system to do an assessment.
9. DEP should provide written notification within 30 days of receiving a complete/adequate assessment from a water system.

**Celebrating the 30<sup>th</sup> Anniversary of the PA Safe Drinking Water Act (1984-2014)**

10. The "5 days to repair monitoring and reporting equipment for turbidity or disinfection" requirement is often not possible. The regulations should also use "working days" instead of just days.
11. Systems should have automatic shutdown capability.
12. A water system that is manned while in operation does not need automatic shutdown capability.
13. DEP should provide additional cost information on alarm and automatic shutdown systems as well as on providing auxiliary power.
14. The proposed language related to filter bed evaluation programs needs to be clarified.
15. DEP should provide written notification within 30 days of receiving required disinfection profiles.
16. Maintaining 0.3/1.0 chlorine residual levels in the distribution system will be difficult for some water systems.
17. TAC Board members recommend that DEP provide discussion in the preamble regarding disinfection residual levels and a water system's ability to meet the disinfection requirements.
18. DEP should consider the cumulative costs of the regulation package.
19. DEP should define "significant land use change" in reference to source protection.
20. The TAC Board recommends a 90 day comment period on the proposed regulations.

Thank you for the opportunity to comment.

Sincerely,

  
Serena DiMagno  
Chairperson