



pennsylvania

DEPARTMENT OF ENVIRONMENTAL
PROTECTION
BUREAU OF SAFE DRINKING WATER

March 25, 2016

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

Re: Comments on the Revised Total Coliform Rule (RTCR) updates to Chapter 109

Dear Ms. Daniels:

The Small Systems Technical Assistance Center (TAC) Advisory Board met on March 16, 2016 to review and discuss the Department's draft-final changes to the safe drinking water regulations, specific to the Revised Total Coliform Rule (RTCR). The following comments were approved by the TAC Board:

1. There should be a statement added to the Order of the final rule that Section 109.301(3)(i)(E) does not apply in Pennsylvania because all public water systems will be required to conduct monthly monitoring. The motion passed by a unanimous vote.
2. The RTCR technical guidance document needs to clarify that, if a check sample location for repeat monitoring is not available within 5 service connections upstream or downstream of the coliform-positive routine monitoring location, there is the flexibility to use an alternate check sample location. This clarification should also be included in the Order of the final rule. The Department also needs to explain in the guidance document the process for a water system to request using an alternate check sample location. The motion passed by a unanimous vote.
3. The RTCR technical guidance document needs to clarify that repeat monitoring and check samples are equivalent. The motion passed by a unanimous vote.
4. Section 109.301(3)(ii)(D) should be revised to include "from the same locations" for the additional sets of check samples for clarity. The suggested language is as follows:

At a minimum, the system shall collect one set of check samples for each total coliform-positive routine sample. If a check sample is total coliform-positive, the public water system shall collect an additional set of check samples from the same locations in the manner specified in this subparagraph. The system shall continue to collect additional sets of check samples FROM THE SAME LOCATIONS until either total coliforms are not detected in a set of check samples, or the system determines that an assessment has been triggered under § 109.202(c)(4).

Additionally, the RTCR technical guidance document should include the example used by the Department during the discussion. The motion passed by a unanimous vote.

5. Section 109.301(3)(ii)(F) should be revised as follows:

If an upstream or downstream repeat monitoring location identified in the sample siting plan is not available in the timeframe specified in this subparagraph, the public water system SHALL NOTIFY THE DEPARTMENT PRIOR TO COLLECTING THE CHECK SAMPLE THAT THE CHECK SAMPLE WILL BE COLLECTED FROM A LOCATION WITHIN REASONABLE PROXIMITY TO THE ROUTINE MONITORING LOCATION.

Additionally, the RTCR technical guidance document should clarify that the Department does not need to approve the alternate repeat monitoring location prior to sample collection. The motion passed by a unanimous vote.

Thank you for the opportunity to comment.

Sincerely,



Serena DiMagno
Chairperson