

August 25, 2017

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

**RE: Comments on the Draft Final-Form Disinfection Requirements Rule
(Chapter 109 – Safe Drinking Water)**

Dear Ms. Daniels:

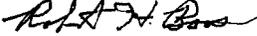
The Small Water Systems Technical Assistance Center (TAC) Advisory Board met on July 13 & August 24, 2017 to discuss the draft Final-Form Disinfection Requirements Rule. The TAC Board approved the following comments at the August 24, 2017 meeting:

1. DEP should modify the proposed language to identify whether the distribution system disinfection sample site is located within the mixing zone. The motion passed by a unanimous vote.
2. 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 passed by a unanimous vote.
3. 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 passed by a unanimous vote.
4. Water systems using continuous analyzers for distribution system disinfection residual measurements as described in their monitoring plan should calculate a daily average to be reported to the Department. The motion passed by a unanimous vote.
5. 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 passed by a unanimous vote.
6. 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 passed by a vote of 9 to 5.
7. The deadline for developing the nitrification control plan should be delayed for 1 year after the effective date of the final rule. The motion passed by a vote of 12 to 2.

8. 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 passed by a voice majority vote.
9. DEP should retain the compliance calculations as proposed for water systems serving a population of 33,000 or less. The motion passed by a voice majority vote; there was 1 nay.

Thank you for the opportunity to comment.

Sincerely,

DocuSigned by:

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Mr. Robert Boos
Vice-Chairman