



SOUTHWEST REGIONAL OFFICE

February 18, 2016

CERTIFIED MAIL NO. 7015 0640 0007 9700 5021

NOTICE OF VIOLATION

James L. Good, Executive Director
Penn Liberty Plaza 1
1200 Penn Avenue
Pittsburgh, PA 15222

Re: Violations of the Pennsylvania Safe Drinking Water Act and Regulations
PWS ID No. 5020038
Pittsburgh Water and Sewer Authority
Allegheny County

Dear Mr. Good:

On July 26, 1995, the Department of Environmental Protection ("Department") approved a feasibility study conducted by the Pittsburgh Water and Sewer Authority (PWSA) for corrosion control. In response to the findings of this study, the Department issued Permit #465W001-T1-C1 requiring corrosion control treatment through pH adjustment with soda ash and establishing associated water quality parameters.

The Department has determined that Pittsburgh Water Sewer Authority did not provide corrosion control treatment in accordance with Permit #465W001-T1-C1 by eliminating soda ash addition to water provided for human consumption, during 2014 through January 21, 2016.

Section 7(a) of the Safe Drinking Water Act 35 P.S. 721.7(a) provides, "it shall be unlawful for any person to construct, operate or substantially modify a community water system without first having received a written permit from the Department". Eliminating or otherwise, altering corrosion control treatment as authorized by a Public Water Supply permit constitutes a substantial modification of a water system, thus placing PWSA in violation of 35 P.S. 721.7(a) and 25 Pa. Code 109.501(b)(d).

As an initial step to regain compliance, the Department requests a written response within 30 days of the date of this letter that explains PWSA's actions and related circumstances that resulted in this violation and PWSA's proposed corrective actions with regard to this violation. Include with your response, copies of all lead and copper sample results that PWSA may have collected during 2014 and 2015 and copies of any notifications provided to PWSA customers regarding the removal of optimized corrosion control treatment.

Removal of optimized corrosion control treatment may have had a destabilizing effect on the protective calcium carbonate barrier lining the interior pipe walls within PWSA's distribution system. In order to assess the extent of destabilization, PWSA's lead and copper monitoring requirements will be reset from 'reduced monitoring to 'initial monitoring'. PWSA's first round of initial lead and copper tap monitoring should be collected before June 30, 2016.

Before conducting initial sampling, PWSA should review and update its Lead and Copper monitoring plan to assure it meets the required elements specified under 25 Pa. Code 109.1103(g).

Please submit your response to the address listed at the bottom of this letter. Please contact me with any other questions or concerns at 412-442-4214 or mafrederic@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kay Frederick', written over a light blue horizontal line.

Kay Frederick
Operations Section Chief
Safe Drinking Water Program -SWRO

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Kay Frederick
Operations Section Chief
Safe Drinking Water Program -SWRO

bcc: Region
Geoffrey Butia, Allegheny County Health Department
John Jeffries, Allegheny County Health Department
A. Eichler, SDW Program Manager