

## 2009 General Update to Chapter 109 Questions & Answers (Q&A)

<b>Monitoring Requirements/Waiver Protocol:</b>
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**Q:** Where can I obtain additional copies of the Monitoring Waiver Application and Instructions?

**A:** These forms are available on our web site using the Keyword: Monitoring Waivers.

**Q:** If our system decides not to request a waiver or our waiver request is denied, when are we required to monitor?

**A:** Water systems must request and receive a waiver or monitor by the following dates:

**For Asbestos:**

Obtain a waiver or monitor all vulnerable sampling locations once every 9 years during the 1<sup>st</sup> 3-year compliance period, which is 2011-2013.

**For IOCs:**

- For surface water (SW) entry points (EP), obtain a waiver or monitor annually beginning in 2011.
- For groundwater (GW) or groundwater under the direct influence of surface water (GUDI) EPs, obtain a waiver or monitor once every 3 years during the 2<sup>nd</sup> year of the 3-year compliance period, which is 2012.

**For VOCs:**

- For groundwater EPs with a previous detect for VOCs, obtain a waiver or continue to monitor annually. EPs which have VOC removal treatment are not eligible for a waiver.
- Note: For EPs with no previous detect for VOCs, monitoring waivers are not required. Water suppliers may qualify for and remain on reduced monitoring so long as all subsequent monitoring results are non-detected.

**For SOCs (including 28 Pesticides, Dioxin and PCBs):**

Obtain a waiver or monitor for each of the regulated SOCs during the appropriate year (i.e., based on the VOC Year Code indicated below):

- If you conducted 4 consecutive quarters of initial monitoring for one or more SOCs at some point in the past, you may monitor at a reduced frequency for those SOCs. If you are using historical data to demonstrate initial monitoring was completed, the results must be reported to DEP. For systems serving more than 3,300 people, reduced monitoring consists of 2 quarterly samples collected in the 2<sup>nd</sup> and 3<sup>rd</sup> calendar quarters in 2011. For systems serving 3,300 or fewer people, reduced monitoring consists of 1 quarterly sample collected in the 2<sup>nd</sup> calendar quarter in 2011.
- If you have not conducted initial monitoring for one or more SOCs, you must conduct initial monitoring (4 quarterly samples beginning with the January-March quarter) during the following VOC Year:

- Systems serving more than 500 people have a VOC Initial Year of 1; **initial monitoring will begin in 2011.**
  - Systems serving 101 to 500 people have a VOC Initial Year of 2; **initial monitoring will begin in 2012.**
  - Systems serving 100 people or less have a VOC Initial Year of 3; **initial monitoring will begin in 2013.**
- For a complete list of regulated SOCs, please refer to Section G of the monitoring waiver application instructions.

**Q:** Several sections of the General Update training materials recommend that water suppliers complete a comprehensive monitoring plan to ensure routine compliance monitoring is representative of all sources. Is a Comprehensive Monitoring Plan Template available?

**A:** Several states require PWSs to complete a comprehensive monitoring plan. Here is a link to some templates from Colorado:

<http://www.cdphe.state.co.us/wq/drinkingwater/PublicWaterSystemReportingForms.html>

A template for PA water systems will be posted later this year.

**Q:** How do systems ensure that non-permanent sources/entry points (EP) are properly monitored?

**A:** All permitted sources/EPs (regardless of their designation) should be exercised/used at least annually to maintain the permit, ensure monitoring is conducted, and to ensure the facilities remain in good working order.

**Q:** Now that the nitrite waiver has been rescinded, when should nitrite samples be collected?

**A:** Nitrite samples should be collected whenever nitrate samples are due, and visa versa. These samples are always paired samples.

**Q:** Performance monitoring may be required as per Chapter 109 and/or the permit when treatment has been installed for a particular contaminant. This monitoring is in addition to routine compliance monitoring. Are performance monitoring requirements tracked in PADWIS or on the Monitoring Calendars?

**A:** No, performance monitoring requirements must be tracked manually.

**Q:** Will PADWIS eventually require monitoring for interim (I), seasonal (S), and reserve (R) entry points or sources?

**A:** Yes

**Q:** If a system decides to composite samples and they are required to do the follow-up analysis on the duplicate sample (due to a detection at 1/5 of the MCL) should (or how should) the original composite results be reported?

**A:** The original composite results should not be reported. They are invalid results. Each individual sample will need to be analyzed and reported.

**Q:** When a 2-carbon compound is detected, vinyl chloride analysis is required. Is PADWIS looking for this data and will it generate a violation if it's not analyzed? Also, 1,1,2-Trichloroethane is not included in the list in Chapter 109 – is this intentional?

**A:** Yes, PADWIS will generate a violation if vinyl chloride is triggered and not monitored. EPA specified which 2-carbon compounds trigger monitoring for vinyl chloride. Not all 2-CCs were included in the federal rule.

**Q:** If a selling system does not monitor for IOCs, VOCs, or SOCs, does the purchasing system incur a PADWIS monitoring/reporting violation?

**A:** PADWIS will not generate an automatic violation. Staff should determine the appropriate response on a case-by-case basis and generate a manual violation as needed. If the selling system fails to conduct the required monitoring, consecutive systems are responsible for collecting the missing samples.

**Q:** Do all CWS and NTNC water systems need to complete Module 5 (asbestos, dioxin and PCB) waiver request forms in order to receive a waiver?

**A:** Yes, Module 5 must be completed and submitted to DEP if the water supplier wants to receive a waiver. The Department cannot make a determination about these parameters unless the water supplier provides the necessary information.

**Q:** Is there a listing of topo quads with asbestos-bearing formations? This may help NTNC systems that may not have information about their well.

**A:** Regional hydros have created these data layers.

**Q:** There was some discussion about data management and tracking of waiver information. Clarify what PADWIS will do in 2011 – especially when it comes to the monitoring calendars that are sent to water suppliers.

**A:** All current monitoring waivers expire on 12/31/2010. PADWIS will re-set the monitoring frequencies to initial or reduced monitoring based on the VOC Year Code unless a new waiver is requested, approved and entered into PADWIS.

**Q:** Do consecutive water systems need to request a waiver from asbestos monitoring?

**A:** Yes. Consecutive water systems need to complete Module 5 for asbestos and provide information about asbestos-cement pipe and compliance with the Lead and Copper Rule in order to obtain a waiver from monitoring.

**Q:** Do water systems need to request waivers for Asbestos, Dioxin & PCBs?

**A:** Yes, all water systems must submit Module 5 and meet the required criteria in order to receive a waiver from monitoring.

**Q:** Chapter 109 indicates that reduced monitoring must be conducted during the quarter with the highest previous result? Will PADWIS track this?

**A:** No. Water suppliers must track this manually and ensure compliance.

**Q:** Where can water suppliers obtain their source contribution/source protection areas?

**A:** Water suppliers can obtain these from their Source Water Assessment Report. Water suppliers may also choose to conduct a more rigorous delineation and better define their source contribution areas.

**Q:** Do water suppliers need to have previous SOC monitoring data in order to qualify for a susceptibility waiver?

**A:** Yes, the water supplier must have at least one sample result that indicates the SOC in question was non-detected.

**Q:** Is the state still issuing any state-wide waivers for SOCs?

**A:** No, all state-wide waivers have been rescinded. Water suppliers may request a “use” or “susceptibility” waiver on a case-by-case basis.

**Q:** Regarding asbestos waivers, what does OCCT mean?

**A:** Optimized corrosion control treatment (OCCT) is tied to EPA’s definition of “deemed” and “done”. Small and medium systems achieve OCCT by not exceeding the lead or copper action levels. Large systems must meet the action levels AND be in compliance with their WQPs.

**Q:** When evaluating SOC usage, how far back should water suppliers look at historical land use/product usage data?

**A:** Penn State recommends that we go back at least 10 years to capture historical land use/product usage data. Many pesticides can remain in the environment for several years (even up to 20 years) after application.

<b>Other Requirements:</b>
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**Q:** Can a person working as a sample collector for an accredited lab measure the accreditation-by-rule parameters?

**A:** § 109.304(c) was revised to include “an environmental lab meeting the requirements of Chapter 252”. Lab personnel may analyze ABR parameters so long as the basic requirements for training, appropriate methods, etc. under Chapter 252 are met.