

Minutes of the November 9, 2018 Meeting  
Small Water Systems Technical Assistance Center (TAC)  
Advisory Board

A regular meeting of the TAC Board was called to order by Chairperson Serena DiMagno at 9:15 AM in Room 105 of the Rachel Carson State Office Building. The purpose of the meeting was to discuss topics requested by Board members that are or may be impacting water systems in Pennsylvania.

**The following Board members were present:**

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)  
Robert Boos, Pennsylvania Infrastructure Investment Authority (PIIA) – *via webinar*  
Doug Crawshaw, American Water Works Association (AWWA)  
Serena DiMagno, Water Works Operators Association of Pennsylvania (WWOAP)  
Jack Gombach, Pennsylvania Association of Realtors (PAR)  
Mary Roland, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO) –  
*via webinar*  
Sikh Singh, RCAP Solutions  
James Steele, Pennsylvania Builders Association (PBA)

**The following Alternate members were present:**

Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP) – *via webinar*  
Lisa Daniels, Pennsylvania Department of Environmental Protection (DEP)  
Ashley Everette, Office of Consumer Advocate (OCA)  
Sharon Fillmann, American Water Works Association (AWWA)  
Joel Jordan, Pennsylvania Rural Water Association (PRWA)  
Clint McKinley, Pennsylvania Public Utility Commission (PUC)  
Larry Miller, Pennsylvania Builders Association (PBA)  
Curt Steffy, State Board for Certification of Sewage Treatment Plant and Waterworks Operators (SBCSTPWWO)

**The following Organizations were not represented:**

County Commissioners Association of Pennsylvania (CCAP)  
Center for Rural Pennsylvania (CRP)  
League of Women Voters, Pennsylvania  
Pennsylvania Association of Conservation Districts, Inc. (PACD)  
Pennsylvania Department of Community & Economic Development (DCED)  
Pennsylvania Manufactured Housing Association (PMHA)  
Pennsylvania State Association of Township Supervisors (PSATS)  
Rural Utilities Services (RUS)

Members/alternates from 12 organizations were present; therefore, a quorum was achieved.

**The following Department of Environmental Protection (DEP) staff were present:**

Jeff Allgyer, Bureau of Safe Drinking Water  
Brian Chalfont, Policy Office  
Sean Gimbel, Office of Water Programs  
Sabrina Haydt, Bureau of Safe Drinking Water

Dawn Hissner, Bureau of Safe Drinking Water  
Joanne Nardone, Bureau of Safe Drinking Water  
Aaron Ward, Bureau of Safe Drinking Water

**Non-Members present at the meeting:**

Carolyn Hathaway, Aqua PA Water Co.  
Erik Ross, Milliron Goodman  
George Kunkle, Operator Outreach Assistance Program  
Cody Cutler (Cutter), Pa American Water Co.  
Scott Sharp, Pa American Water Co.

Will Dando, PA Coal Alliance  
Allison Aminto, Philadelphia Water Department  
Rita Kopansky, Philadelphia Water Department  
Dennis O'Connor, Philadelphia Water Department

**General Advisory Board business:**

Three items of general business were discussed:

- The draft minutes from the May 24, 2018 TAC Board meeting were presented for discussion. No edits were noted. Jack Gombach (PAR) made a motion to approve the May 24, 2018 minutes; Jim Steele (PBA) seconded the motion. The motion passed by a unanimous vote.
- The TAC Board agreed to allow the public to attend the meeting via the webinar, provided there can be some control put in place to ensure the non-members are not voting on motions or are not speaking out of turn. The Board suggested that the webinar option be publicized for the 2019 meetings (on each agenda) and the issue be revisited at the 4<sup>th</sup> quarter meeting to determine whether to continue to allow the public to attend the meetings via the webinar after 2019.
- Selection of 2019 meeting dates: These dates (for quarterly meetings in 2019) were selected and confirmed at the end of the meeting. January 31, May 14, August 8, November 14. Room 105 (RCSOB) is reserved for these dates.

**1-Hour Reporting Discussion**

DEP reminded the members that not all 1-hour reporting situations are immediate violations (the 1-hour reporting may just be the start of a consultation) and that 1-hour reporting is required if water of questionable quality has the potential to reach the entry point.

TAC requested that additional clarification on the following issues be included in the guidance being developed:

- Low vs. no chlorine residuals – provide examples specific to unmanned plants because there are differences in on-line analyzers (DPD vs. amperometric) and recording devices (SCADA vs. data loggers) and whether the PWS is using an on-line analyzer or is conducting grab sampling; examples should include whether the unmanned plant has automatic intervention if a problem occurs.
- The chemical spill noted in § 109.703(a)(3)(iii)(D) – clarify how location, secondary containment or quantity factors into the determination that 1-hr reporting is required.
- The “other situations” noted in § 109.703(a)(3)(iii)(E) & (G) specific to storm events; WWTP being bypassed and how far upstream from the intake that the PWS needs to track these types of events.

- Loss of Positive Pressure: What is low pressure vs. loss of pressure?

TAC recommended that the posters for 1-hour reporting be revised but still made available as a publication.

### **Perfluoroalkyl & Polyfluoroalkyl Substances (PFASs)**

DEP provided a brief overview of PFAS:

- PFASs are man-made chemicals, are resistant to heat, water and oil, and persist in the environment and the human body. PFAS are not found naturally in the environment. They have been used to make cookware, carpets, clothing, fabrics for furniture, paper packaging for food, and other materials that are resistant to water, grease, or stains. They are also used in firefighting foams and in a number of industrial processes.
- There are 3,000-4,000 different PFAS chemicals but only a few are captured in current drinking water analytical methods.
- PA first became aware of PFASs as a result of monitoring conducted under UCMR3; UCMR3 required sampling for 6 of these chemicals, including PFOS & PFOA. EPA has set a Health Advisory (HA) level of 70 ppt (combined) for PFOS/PFOA.
- EPA will be publishing a PFAS management plan, including a determination on whether they are moving forward with developing an MCL for any of these chemicals.
- In September, the Governor created a PFAS Action Team. DEP is developing a sampling plan to gather additional occurrence data on PFAS detections in PA water system sources; this plan will be made public when finalized. DEP has created a website for PFAS that includes details in the Action Team meetings: [https://www.dep.pa.gov/Citizens/My-Water/drinking\\_water/Perfluorinated%20Chemicals%20-PFOA%20and%20PFOS%20-%20in%20Pennsylvania/Pages/default.aspx](https://www.dep.pa.gov/Citizens/My-Water/drinking_water/Perfluorinated%20Chemicals%20-PFOA%20and%20PFOS%20-%20in%20Pennsylvania/Pages/default.aspx).
- PFAS will continue to be a topic on TAC agendas when additional updates are available.

### **Draft USSP forms**

TAC requested these additional details be included in the forms and instructions:

- Definition for uninterrupted service. Explain DEP's expectations regarding uninterrupted service & resiliency.
- Clarification that the certification is for completion of the plan, not the provision of uninterrupted service for any emergency situation.
- Clarify whether each PWS must purchase its own generators or may one (or more) be rented?
- Clarify how the USSP form may be incorporated into the ER plan.
- Consider separate versions for systems with SW vs. GW sources. Consider a webinar for the larger water systems to discuss the level of detail required in completing the form.

### **Unregulated Contaminants**

DEP provided the following information:

- EPA has set Health Advisory (HA) levels for several unregulated contaminants, including PFOS/PFOA, cyanobacteria microcystins & cylindrospermopsin (resulting from a cyanotoxin bloom) and manganese. The most recent listing of HA levels are detailed in the EPA guidance document (*2018 Drinking Water Standards and Advisory Tables*): <https://www.epa.gov/sites/production/files/2018-03/documents/dwtable2018.pdf>
- DEP has the authority under the PA SDWA and Chapter 109 SDW Regulations to require water systems to take corrective actions if an unregulated contaminant is detected at a level above the HA level.
- If an unregulated contaminant is detected above a HA level at the entry point, the PWS must notify DEP within 1-hour of discovery of the results, regardless of whether the monitoring is voluntary or required (such as for UCMR).

### Upcoming Initiatives

DEP provided information on these topics:

- Manganese in Surface Water – proposed change to the Mn Water Quality Standard (WQS): In Oct 2017, legislation was finalized requiring DEP to develop regulations moving the compliance point for the manganese WQS from the point of wastewater discharge to the point of the PWS intake. DEP is conducting a comprehensive review of the manganese WQS & will provide an update in this review at the 1<sup>st</sup> meeting of the TAC board in 2019.
- Act 39 of 2018 (part of PA's fiscal code) included a revision to the Public School Code that requires public schools to either test their water for lead (& take correction action if lead levels are elevated) or hold a public meeting. This requirement falls under the authority of the PA Dept. of Education; PDE has developed a website with information for schools: <https://www.education.pa.gov/Schools/safeschools/resources/Pages/Lead-in-Drinking-Water.aspx>
- Water Infrastructure Improvements for the Nation (WIIN) Act: one provision requires that public notice be issued within 24 hours if lead is detected above the action level. EPA must develop regulations before states have the authority to enforce this provision.
- Water Resources Development Act (WRDA) of 2018: included what equates to a reauthorization of the federal SDWA without the fiscal elements. Bill does include: lead testing for schools and child-care facilities, grant amounts for PWSS and DWSRF, a provision that PWSs with a population over 10,000 will have to deliver their CCR twice each year, and a provision that all CWSs with a population 3,300-10,000 will have to conduct UCMR monitoring (DEP believes the legislation states that this is based on available funding & that EPA will pay for the analysis costs); EPA will have to develop regulations before states have the authority to enforce these provisions.
- LCR-Long Term Revisions proposed rule is expected sometime in 2019.

### Adjourn

Jim Steele made a motion to adjourn. The motion passed by a unanimous vote, and the meeting adjourned at 2:20 PM.