

Minutes of the April 29, 2021 Meeting
Public Water System Technical Assistance Center (TAC) Board

A virtual, regular meeting of the TAC Board was called to order by Chairperson Serena DiMagno at 9:05 AM. The purpose of the meeting was to receive updates from the subcommittee reviewing the TAC Bylaws and to discuss revisions to the bylaws.

The following Board members were present:

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)
Doug Crawshaw, American Water Works Association, Pennsylvania Chapter (AWWA)
Serena DiMagno, Water Works Operators Association of Pennsylvania (WWOAP)
Roger Hadsall, Pennsylvania Rural Water Association (PRWA)
Russell James, Pennsylvania Manufactured Housing Association (PMHA)
Clint McKinley, Pennsylvania Public Utility Commission (PUC)
Mary Roland, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)
Sukhwinder Singh, RCAP Solutions, Inc.
James Steele, Pennsylvania Builders Association (PBA)

The following Alternate members were present:

Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP)
John Brady, Rural Utilities Service (RUS) – not yet an official appointee (non-voting representative)
Jennifer Case, Pennsylvania Municipal Authorities Association (PMAA)
Christine Caldara Piatos, Center for Rural Pennsylvania (CRP)
Lisa Daniels, Pennsylvania Department of Environmental Protection (DEP)
Sharon Fillmann, American Water Works Association, Pennsylvania Chapter (AWWA)
Mary Gaiski, Pennsylvania Manufactured Housing Association (PMHA)
Erin Gannon, Office of Consumer Advocate
Joel Jordan, Pennsylvania Rural Water Association (PRWA)
Matt Lamb, Pennsylvania Public Utility Commission (PUC)
Tesra Schlupp, Pennsylvania Infrastructure Investment Authority (PIIA)
Mark Smith, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)
James Wheeler, Pennsylvania State Association of Township Supervisors (PSATS)

The following Organizations were not represented:

County Commissioners Association of Pennsylvania (CCAP)
Department Community and Economic Development (DCED)
League of Women Voters, Pennsylvania (LWVPa)
Pennsylvania Association of Conservation Districts, Inc. (PACD)
Pennsylvania Association of Realtors (PAR) – *nominated member/alternate present (awaiting approval)*

Members/alternates from 15 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
Angie Anderson, Bureau of Safe Drinking Water
Jill Anderson, Bureau of Safe Drinking Water
Kevin Anderson, Bureau of Safe Drinking Water
Brad Baker, Bureau of Safe Drinking Water
Ed Chescattie, Bureau of Safe Drinking Water
Nate Crawford, Bureau of Safe Drinking Water
Dave Grube, Bureau of Safe Drinking Water

Sabrina Haydt, Bureau of Safe Drinking Water
Mike Hess, Bureau of Safe Drinking Water
Dawn Hissner, Bureau of Safe Drinking Water
Sheryl Martin, Bureau of Safe Drinking Water
Bill McNamara, Bureau of Safe Drinking Water
Brian Chalfant, Policy Office
Theia Hofstetter, Bureau of Clean Water
Bob Kachonik, Bureau of Clean Water

Non-Members present at the meeting:

Jeff Bickel, Aqua PA
Carolyn Hathaway, Aqua PA
Alison Aminto, Phila. Water Department (PWD)
Dennis O'Connor, PWD
Kate Guest, PWD
Rita Kopansky, PWD
Linda Kramer, PWD
Brandy Braun, PA American Water Co.

Christine Swailes, Suez
Matt Walborn, Western Berks Water Authority (WBWA)
Savannah Beeler, PA Association of Realtors (PAR)
Greg Herb, PAR
Derik Dressler, RCAP
Wanda Rios Martinez, RCAP
Josephine Martin, citizen

General Advisory Board business:

Two items of general business were discussed:

- The draft minutes from January 28, 2021 TAC Board meeting were presented for discussion. No edits were noted. Jim Steele (PBA) made a motion to approve the January 28, 2021 minutes as presented; Mary Gaiski (PMHA) seconded the motion. The motion passed by a unanimous vote.
- Minor revision to TAC Board Bylaws :
 - A suggestion was made to slightly revise the wording of one of the bullet points under the PURPOSE in the revised bylaws.
 - Instead of: "Evaluate the management, operational and implementation impact of drinking water regulations and provide input."
 - Revise this bullet to say: "Evaluate and provide input on the management, operational and implementation impact of drinking water regulations."
 - The suggested revision was presented to the Bylaws subcommittee via email for discussion. The subcommittee unanimously approved the suggestion.
 - All TAC members agreed to the proposed changes.

Review and Discussion – Guidance for Filter Plant Performance Evaluations (FPPE)

- This technical guidance document is being revised to include regulatory revisions and updated Area-Wide Optimization Program (AWOP) goals.
 - The timeline for DEP staff to complete the FPPE and report has been updated and now includes an exit meeting.

- The references to the microscopic particulate analysis (MPA) and particle counters has been removed.
- Clarification has been added that FPPE reports are considered sensitive information by DEP.
- Attachments for ultraviolet light (UV) and ozone treatment have been added; the attachment for membranes has been updated.
- TAC provided the following comments:
 - The FPPE should be separate from an inspection (pg. 1). DEP reminded TAC that DEP cannot ignore violations identified during any site visit, including technical assistance visits. The inspection report is completed to document violations separately from the FPPE report because there are different requirements and requested outcomes.
 - The optimization goals (pg. 3) are not realistic; DEP reminded TAC that these goals come from AWOP.
 - Water systems using chloramination are not always able to achieve a free chlorine residual < 0.1 ppm without taste & odor issues (pg. 3).
 - Provide clarification for advance preparation (pg. 5).
 - Provide clarification on filter-to-waste (pg. 16).
 - Provide clarification on “hold output” for turbidity recording during periods of non-production and what is meant by the data instrument needs to match the recorded data (pg. 21).
 - DEP should re-evaluate all the turbidity monitoring/reporting requirements (regulation, FPPE goals, AWOP goals, Partnership goals, and WebOAS requests) – there are too many for PWSs to keep track of. Monitoring & reporting for voluntary programs should align with regulatory requirements (pg. 82).
 - It should be noted in the attachments for UV and ozone that the treatment may be for oxidation, not disinfection.

Review and Discussion – General Permits

DEP is proposing the first Safe Drinking Water General Permit (for storage tank painting). TAC provided the following comments on the draft documents:

- Add clarification to the engineer’s report that this item applies *only* to tank painting only (pg. 1).
- In item 8 (pg. 2), change 0.20 to 0.2 to match DRR requirements.
- In item 11 (pg. 2), clarify whether any approved method for VOC testing may be use or must one of the specified methods be used for analysis?
- In item 24 (pg. 16-2b), add clarification as to when a tank may be placed into service:
 - TAC recommended that an appropriately certified operator should be allowed to determine whether to put a tank into service without DEP involvement if non-regulated VOCs are detected.
 - TAC recommended that the water system should have the option to re-chlorinate and resample prior to notifying DEP if the first set of results are coliform positive.
 - DEP reminded TAC that these requirements are part of the current process (prior to amending the operations permit) and agreed to evaluate the language and add clarification where appropriate (the instructions vs. item 24).

SDW Update

- PFAS
 - Federal actions: EPA issued the final PFAS regulatory determination; EPA is moving forward to develop a proposed rule for PFOS & PFOA. EPA expects to publish a proposed rule by March 2023. A final rule is not likely before August 2024, so the compliance deadline is expected to be in 2027.
 - State actions:
 - The SDW PFAS sampling was completed in March 2021. All sites sampled in 2019 were resampled in 2020 to obtain results for 18 PFAS. Updated results were posted to the website in Feb 2021. The final results will be posted as soon as DEP completes review of the QA/QC data.
 - The toxicology review has been completed by Drexel and a draft report was submitted to DEP in January 2021. A few revisions are necessary to correct typographical errors.
 - DEP will be moving forward with a proposed rulemaking in late 2021.
- Other Federal regulatory activity
 - LCRR: The effective date has been delayed until June 17, 2021. A proposed rule with a 30-day public comment period has been published to further extend the effective date until December 16, 2021 and the compliance date to January 16, 2024 to allow time for additional stakeholder input through virtual meetings in spring/summer 2021.
 - UCMR5: The proposed rule was published on March 11, 201 with a 60-day public comment period. The proposed UCMR5 includes 29 PFAS (by EPA Methods 537.1 & 533) and lithium; PFAS could be grouped into 1 of the 30 possible slots because they are included in the same analytical method. If federal funding is secured and there is sufficient lab capacity, all systems with a population > 3,300 will be required to sample. The final UCMR5 is expected in 2022, so testing would be conducted 2023-2025.
- TAC requested an update regarding when notification to Bureau of Clean Water (BCW) is required for water line breaks.
 - BCW has a Fact Sheet that provides some details. BCW also confirmed that test strips may be used to check for a chlorine residual in discharged water.
 - TAC noted that 2 regions have a specific form that water systems must submit for every water line break (even if the break does NOT affect a waterway).
 - TAC requested clarification to both water systems and BCW staff for consistent implementation of this requirement.
- TAC requested clarification on the EPA Needs Assessment Survey.
 - This is a federal requirement and is being completed virtually as much as is possible.
 - Technically, the survey is voluntary, but there are significant consequences if systems refuse to participate because the data is used to determine each State's funding from the Drinking Water State Revolving Fund that is used to support PIIA funding and DEP technical assistance programs.
 - There are 56 PA water systems that were identified for this survey. DEP cannot "replace" a water system that refuses to participate, so the needs are then estimated. Pennsylvania's allotment was reduced as a result of the last survey.

Public Comments:

Carolyn Hathaway with Aqua PA had questions and suggested edits for the General Permit, so she was asked to send the specific details via email to Mike Hess.

Adjourn

Jim Steele made a motion to adjourn. The motion passed by a unanimous vote and the meeting adjourned at 12:03 pm.

DRAFT