

Minutes of the August 14, 2024 Meeting
Public Water System Technical Assistance Center (TAC) Board

A regular meeting of the TAC Board was called to order by Vice-Chairperson Sharon Fillmann at 9:02 AM. This was the third regularly scheduled meeting of 2024.

The following Board members were present:

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)
Jeff Bickel, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)
Rob Boos, Pennsylvania Infrastructure Investment Authority (PIIA)
John Brady, Rural Utilities Service/Rural Development (RUS)
Doug Crawshaw, American Water Works Association, Pennsylvania Chapter (AWWA)
Amy Forsha, RCAP Solutions, Inc (RCAP)
Roger Hadsall, Pennsylvania Rural Water Association (PRWA)
Clint McKinley, Pennsylvania Public Utility Commission (PUC)
James Steele, Pennsylvania Builders Association (PBA)

The following Alternate members were present:

Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP)
Jennifer Case, Pennsylvania Municipal Authorities Association (PMAA)
Ed Chescattie, Pennsylvania Department of Environmental Protection - Bureau of Safe Drinking Water
Sharon Fillmann, American Water Works Association, Pennsylvania Chapter (AWWA)
Patrick Fromm, Rural Utilities Service/Rural Development (RUS)
Joel Jordan, Pennsylvania Rural Water Association (PRWA)
Matt Lamb, Pennsylvania Public Utility Commission (PUC)
Emme Reiser, Pennsylvania Association of Realtors (PAR)
Mary Roland, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)
Tesra Schlupp, Pennsylvania Infrastructure Investment Authority (PIIA)

The following Organizations were not represented:

County Commissioners Association of Pennsylvania (CCAP)
Center for Rural Pennsylvania (CRP)
Department Community and Economic Development (DCED)
League of Women Voters, Pennsylvania (LWVPa)
National Association of Water Companies (NAWC)
Office of Consumer Advocate (OCA)
Pennsylvania Association of Conservation Districts, Inc. (PACD)
Pennsylvania Manufactured Housing Authority (PMHA)
Pennsylvania State Association of Township Supervisors (PSATS)

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

Department of Environmental Protection (DEP) staff attending the meeting:

Angi Anderson, Bureau of Safe Drinking Water
Jill Anderson, Bureau of Safe Drinking Water
Lisa Beatty, Bureau of Safe Drinking Water
June Black, 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
Mike Lewis, Bureau of Safe Drinking Water

Doug Macik, Bureau of Safe Drinking Water
Sheryl Martin, Bureau of Safe Drinking Water
Bill McNamara, Bureau of Safe Drinking Water
Selina Prettnner, Bureau of Safe Drinking Water
Kim Snook, Bureau of Safe Drinking Water
Brian Chalfant, Policy Office
Leda Lacomba, Bureau of Regulatory Counsel
Lindsay Williamson, Bureau of Regulatory Counsel

Non-Members attending the meeting:

Anita Martin, Chester Water/PAAEL
Ryan Hargrove, PA American Water
Christine Stanishefski, PA American Water

Christine Swailes, Veolia Water
Erik Ross, Milliron & Goodman
Nick Demarco, Office of Consumer Advocate (OCA)

General Advisory Board business

- The draft meeting minutes from May 23, 2024 TAC Board meeting were presented for discussion. James Steele (PBA) made a motion to approve the May 23, 2024 minutes as presented. Doug Crawshaw (AWWA) seconded the motion. The motion passed by a unanimous vote.
- DEP provided an update on the procedures for advisory committee meetings, including changes to the process for public comments and reminded members that meeting topics and information are needed 8 weeks prior to the upcoming meeting date.
- The PWS-TAC Board forming TAC subcommittees. Subcommittees will be formed and called as needed. Form regulation subcommittee in early 2025

Review and Discussion: DRAFT General Permit #1 (GP1)

DEP provided an overview of the final draft of the new General Permit (for tank painting). The PWS-TAC Board had the following comments:

- Clarification on how DEP will process Penn Vest applications for tank painting until the GP1 is published as final. DEP reminded the members/alternates that requests for tank painting will continue to be processed as a minor permit amendment until GP1 is final.
- Clarification on how water systems to manage lead abatement under the GP1. DEP reminded the members/alternates that GP1 is intended only for interior tank painting projects so there would/should not be lead paint on a tank interior. External tank repair and painting, including lead abatement, will continue to be managed by the appropriate DEP program(s).

Review and Discussion: Tier 2 Public Notice Template

DEP reviewed the Tier 2 Public Notice (PN) template available on eLibrary. DEP suggested language for a revision to clarify information should be included in the notice and requested comments from the members and alternates. Specifically, the initial paragraph (and corresponding instructions) needs to be edited to clarify what value (sample result and/or running annual average (RAA) compliance value) should be included in the notice. The PWS-TAC Board had the following comments:

- Make the PN as simple as possible, so pick either the sample result or the RAA value (do not include both).
- The RAA value should be used because that is what the health effects are based on, but just call it the average value for simplicity.
- Additional information should be added that the health effects are likely the result of chronic exposure.

SDW Informational Session

LCRR: Remember that the SLI must be completed and submitted to DEP by October 16, 2024. Water systems should regularly check the LCR website for updates. The PWS-TAC Board had the following questions:

- What are the consequences of not submitting a SLI by October 16?
DEP response: Tier 2 PN is required within 30 days if the SLI is not submitted.
- What is DEP evaluating as a “completeness review” when the SLI is submitted?
DEP response: a completeness review is to verify that the PWS included all service lines (based on information previously submitted to DEP).
- Are water systems allowed to submit results from schools doing their own testing to fulfill the requirement to sample 20% of schools each year under the LCRR?
DEP response: EPA has not provided implementation guidance on the LCRR and the LCRI has not been published, so DEP cannot provide an answer at this time.

PFAS:

- The Monitoring Results Summary on the PFAS MCL Rule webpage has been updated and now includes Q1 and Q2 2024 data. All individual results reported to DEP are also available on the DWRS website.
- EPA published the final PFAS Rule on April 26, 2024. The implementation dates are different for monitoring and MCL compliance. PA DEP will have to revise chapter 109 (through a formal rulemaking) to incorporate the federal provisions that are more stringent than the current PFAS MCL Rule.
Important Note: the PA PFAS MCL rule, including 1-hour reporting and Tier 2/Tier 3 PN, remains in effect with enforceable MCLs.
- Most labs accredited by PA are able to meet the analytical requirements specified in the federal rule. The methods approved by both PA and EPA include all 6 PFAS regulated in the federal rule. Each PWS will have to specifically request that their sample(s) be tested for these 6 PFAS.

CCR3: The revised CCR Rule (CCR3) was published as a final rule on May 24, 2024.

- Compliance date is Jan 1, **2027**, so reports issued in 2027 (for CY 2026 data) will need to meet the new requirements.
- The final rule retains the requirement for CWSs serving more than 10,000 people to distribute a CCR twice/year.
- CWSs serving more than 100,000 people will also have to develop and implement a plan to assist consumers with limited English proficiency.

Cybersecurity: DEP provided a few reminders to the group:

- DEP continues to contact medium-sized water systems (serving 3,300-10,000) to check on the status of their cybersecurity efforts and reminding them of opportunities and resources from CISA.

- One of the most basic protective measures PWS staff can & should take to prevent a cyber intrusion is to change the default password on equipment.
- If a cybersecurity attack occurs, 1-hour reporting to DEP is necessary.
- Having a multi-factor authentication (MFA) is highly recommend.

EPA Inspections: EPA continues to focus their inspections on water systems over 10,000 people, but they intend to inspect all CWSs serving more than 3,300 people. EPA has developed a list of 15 questions which will be included in their inspections.

Water System Restructuring Assessment Rule (WSRAR): the proposed rule was published on May 30, 2024. The regulation is required by AWIA of 2018 and will include restructuring incentives for PWSs.

Public Comments

Questions were posed to DEP about the revised FPPE guidance that was recently published. DEP noted that the Technical Services Section Chief was not in attendance, so answers would be provided separately.

Adjourn

Tesra Schlupp (PIIA) made a motion to adjourn. The motion passed by a unanimous vote, and the meeting adjourned at 10:48 AM.