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DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Safe Drinking Water

# **SDW Technical Guidance Revisions**

## **Small Water Systems TAC Meeting**

### **March 29, 2018**

Tom Wolf, Governor

Patrick McDonnell, Secretary

# Field Related Compliance

## ***Existing*** Technical Guidance Document

Title: Safe Drinking Water Program Field-Related Compliance

Effective Date: October 3, 1997

Document No.: 383-3000-101

Purpose: To establish a rational & reasonable basis for staff decisions which will promote quality, timely and consistent service to the regulated community

# Field Related Compliance

## *Existing* Technical Guidance Document

### Content:

- Classification & Response for each violation type:
  - Imminent Threat Violations
  - Priority Violations
  - Management / Administrative Violations
- Attachments include suggested field order language and mandatory health effects language

# Field Related Compliance

## ***Revised*** Draft Technical Guidance Document

### Content:

- Detail on each of the violation types
  - Imminent Threat Violations (A1, A2, and A3)
  - Priority Violations (B)
  - Operational/Administrative Violations (C, D & E)
- Significant Deficiencies
  - Table: Significant Deficiency Examples
  - Compliance Milestones for Significant Deficiencies

# Field Related Compliance

## ***Revised*** Draft Technical Guidance Document

### Content Continued:

- Appendix A:
  - Proper Completion of a Field Order
  - Suggested Field Order Language for Imminent Threat and B6 Priority Violations
- Appendix B:
  - Field Order Examples

# Field Related Compliance

## ***Revised*** Draft Technical Guidance Document

### Changes/Additions:

- Clarification of imminent threat violations
  - Specify which violations are A1, A2, or A3
- Addition of Significant Deficiency section
- Changed title of “Management” violations to “Operational” violations to be consistent with other SDW guidance documents

# Field Related Compliance

## ***Revised*** Draft Technical Guidance Document

### Changes/Additions:

- Addition of Field Order completion instructions and Examples
  - To promote statewide consistency for issuance of field orders among drinking water field staff
- Deletion of mandatory health effects language
  - Contained within EPA regulations (40 C.F.R Part 141, Subpart Q, Appendix A)



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# SDW Field Related Compliance

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# Key Requirements for TNCWSs

## Transient Noncommunity Water System (TNCWS)

- A public water system that does not meet the definition of a community or nontransient noncommunity water system
  - Public Water System: A facility that regularly serves an average of 25 people or 15 service connections at least 60 days per year
  - TNCWS examples include restaurants, churches, convenience stores, golf courses, parks & campgrounds

# Key Requirements for TNCWSs

- Relevance of the *Key Requirements* document
  - Of the 8,400+ active PWSs in Pennsylvania, more than 5,200 (i.e. 62%) are TNCWSs
  - All but 30 TNCWSs rely solely on groundwater
- Focus of the *Key Requirements* document
  - TNCWSs approval process
  - Monitoring & Reporting Requirements
  - Secondary Contaminants
  - Public Notification
  - Record Maintenance



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# Key Requirements for Transient Noncommunity Water Systems (TNCWSs)

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# ▶ PWS Manual Part IV - NCWS Standards

- PWSM Part IV design standards apply to Noncommunity Water Systems (NCWSs)
- NCWSs include both *nontransient and transient* water systems (e.g. schools, hospitals, restaurants, hotels, churches)
- NCWS are different from a CWS
  - Ownership, management, occupancy, type, & size change more frequently
  - Go in and out of existence fairly quickly
  - Pre-existing NCWSs are still actively being identified

# ➤ PWS Manual Part IV - NCWS Standards

- PWSM IV objective is to ensure that new or substantially modified NCWS will be capable of producing an adequate supply of potable water that is in compliance with applicable regulations
- Update goals:
  - Be consistent with new regulations
  - Clarify and simplify existing standards
  - Provide a detailed plan for approval processes
  - Streamline approval process while being protective of public health

# ➤ PWS Manual Part IV - NCWS Standards

- PWS Manual Part IV has not received any major revisions since March of 1998
- Design standards do not match current regulations
- Design standards do not match current technology



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# **PWS Manual - Part IV**

## **Noncommunity Water System**

### **Design Standards**

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# LCR Working Guide

- Lead & Copper Rule (LCR) is intended to control lead & copper levels in PWSs through a treatment technique for corrosion control
- LCR Treatment Technique requirements
  - Optimal Corrosion Control Treatment (CCT) to minimize lead & copper levels at users' taps while ensuring the treatment does not cause other MCL violations
  - Lead Service Line (LSL) replacement
  - Lead Public Education (PE)



# LCR Working Guide

- *Existing* technical guidance document that is a comprehensive guide describing the LCR requirements
- Each section begins with a small/medium water system flow chart that serves as a roadmap
  - Highlighted topics are found in the section
  - Section numbers are in the upper right corner

# LCR Working Guide Updates

*Revised* technical guidance document *includes regulatory revisions through 2010 and revised EPA guidance through 2016*

- Materials evaluation and new LCR Sample Site Plan template information and link
- Consumer tap notice of lead results
- 2016 EPA *revised* lead & copper tap sample collection procedures
- Lead PE content and delivery revisions

# LCR Working Guide Updates

- Link to EPA's 2016 OCCT Manual
  - Systems must optimize CCT at all times
  - Changes in source water or treatment must be approved by DEP *prior* to making the change
- Link to the NTNCWS PE poster and pamphlet
- Partial (LSL) replacement requirements
- Include LSL sites below the lead action level (i.e. replaced through testing) back into the LSL inventory for sampling sites

# LCR Working Guide Updates

- Water Quality Parameter (WQP) compliance determinations
- Revised annual and triennial lead & copper tap monitoring criteria
- Nine year lead & copper tap monitoring waiver requirements for PWSs
- Large PWS reduced WQP monitoring revocation
- Revised operator certification requirements to clarify need for subclass 7 certification



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# Lead and Copper Rule (LCR) Working Guide

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# WQP Reporting Instructions

- New technical guidance
- WQPs referenced in the 2008 *Laboratory Reporting Instructions for Lead & Copper under the LCR*
- This guidance provides uniform, detailed instructions for the reporting of WQP monitoring results to DEP
- Laboratories and PWSs must report data electronically through DWELR

# WQP Reporting Instructions

- WQPs include:
  - Alkalinity, calcium, conductivity\*, temperature\*, pH, and, if an inhibitor is used, silica or orthophosphate
  - (\*These parameters are not required after CCT has been installed)
- WQPs are used to identify optimal CCT and determine if the system is in compliance with the LCR

# WQP Reporting Instructions

- Large systems and those small/medium systems that exceed an Action Level are required to monitor for WQPs
- Specific WQP requirements are based on whether or not the PWS has installed CCT to address a lead and/or copper exceedance





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# Water Quality Parameter (WQP) Reporting Instructions for the Lead & Copper Rule

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