

Minutes of the March 29, 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 DiMugno at 9:10 AM in Room 105 of the Rachel Carson State Office Building. The purpose of the meeting was to discuss the draft final-form General Update and Fees regulation language (Annex A) and finalize TAC's comments.

The following Board members were present:

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)
Robert Boos, Pennsylvania Infrastructure Investment Authority (PIIA) – *via webinar*
Stan Brown, Pennsylvania Public Utility Commission (PUC)
Doug Crawshaw, American Water Works Association (AWWA)
Serena DiMugno, Water Works Operators Association of Pennsylvania (WWOAP)
Jack Gombach, Pennsylvania Association of Realtors (PAR)
Christine Maloni Hoover, Office of Consumer Advocate (OCA)
Mary Roland, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)
James Steele, Pennsylvania Builders Association (PBA)
Judith Tutino, Rural Utilities Services (RUS) – *via webinar*

The following Alternate members were present:

Dennis Beck, Pennsylvania Association of Conservation Districts, Inc. (PACD)
Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP)
Christine Caldara Piatos, Center for Rural Pennsylvania (CRP)
Lisa Daniels, Pennsylvania Department of Environmental Protection (DEP)
Sharon Fillmann, American Water Works Association (AWWA)
Mary Gaiski, Pennsylvania Manufactured Housing Association (PMHA)
Mike Kelly, Pennsylvania Department of Community & Economic Development (DCED)
Seth Loht, RCAP Solutions
Clint McKinley, Pennsylvania Public Utility Commission (PUC)
Curt Steffy, State Board for Certification of Sewage Treatment Plant and Waterworks Operators (SBCSTPWWO)

The following Organizations were not represented:

Pennsylvania Rural Water Association (PRWA)
Pennsylvania State Association of Township Supervisors (PSATS) – *afternoon only*
County Commissioners Association of Pennsylvania (CCAP)
League of Women Voters, Pennsylvania

Members/alternates from 16 organizations were present; therefore, a quorum was present.

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

Jeff Allgyer, Bureau of Safe Drinking Water
Jill Anderson, 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
Hayley Jeffords, DEP Policy Office
Bill McNamara, Bureau of Safe Drinking Water

Nichole McDannell, Bureau of Safe Drinking Water
David Mittner, Bureau of Safe Drinking Water
Jason Minnich, Bureau of Safe Drinking Water
Joanne Nardone, Bureau of Safe Drinking Water
Pauline Risser, Bureau of Safe Drinking Water
Deb Rotz, Bureau of Safe Drinking Water

Non-Members present at the meeting:

Frank Medora, Aqua Pennsylvania
Rita Kopansky, Philadelphia Water Department
Dennis O'Connor, Philadelphia Water Department
Matt Walborn, Western Berks Water Authority

Christina Kistler, MJ Reider
Raphael Quigaad, MJ Reider
Paulina Laudan-Webb, MJ Reider

General Advisory Board business:

Two items of general business were introduced prior to new business:

- The draft minutes from the Dec 7, 2017 TAC Board meeting were presented for discussion. No edits were noted. Mary Gaiski (PMHA) made a motion to approve the Dec 7, 2017 minutes; Mary Roland (SBCSTPWWO) seconded the motion. The motion passed by a unanimous vote.
- Jack Gombach was noted as the new member nominee for PA Association of Realtors and Clint McKinley was acknowledged as the new alternate for the Public Utility Commission.
- Vice-Chairs & Committee Chair elections: several current Vice-Chairs were not present so these elections will be postponed. DEP will provide a list (via email) of Vice-Chairs and committee assignments with the new member/alternate contact information.
- DEP provided an update on the schedule for the 2 remaining regulatory packages (Disinfection Requirements Rule and the General Update & Fees).
 - The DRR was approved by Independent Regulatory Review Committee (IRRC) on February 2, 2018, and should be published as a final rule in late April.
 - The final-form General Update & Fees regulation is scheduled to be presented to the Environmental Quality Board (EQB) on April 17, 2018.

Draft Technical Guidance 1 – Field Related Compliance Strategy

TAC offered the following comments on this pre-draft guidance:

- There needs to be additional information/clarification on what circumstances are considered an imminent threat situation.
- DEP needs to develop a separate guidance on the 1-hour reporting requirements, including an explanation that not all situations requiring 1-hour reporting are violations.

- Add language to Tier 1 Combined Filter Effluent (CFE) event (“confirmed” exceedance); add details for system shut-down.
- Clarification requested on breakdown in disinfection treatment, what is an unexpected loading of pathogens (vs. a heavy rain event), what is a chronic failure to calibrate equipment (& that it should apply only to equipment used for compliance monitoring).
- Requested a copy of the DEP *Policy on Issuing and Removing Public Water Supply Warnings* (DEP will send the link to the eLibrary).
- Discussion on secondary contaminants:
 - The Maximum Contaminant Level (MCLs) for secondary contaminants are enforceable standards in PA, but DEP does not require routine monitoring for all Public Water Systems (PWSs).
 - Some secondary contaminants do have EPA established Health Advisory Levels (HAL).
 - DEP would require corrective actions for MCL or Health Advisory exceedances.

Draft Technical Guidance 2 – Transient Noncommunity Key Requirements

- TAC did not have any comments on this document.
- General discussion on methods of contacting organizations that represent these types of PWSs (RV Association, PA Camping Association, Water Quality Association, Central Atlantic States Association of Food and Drug Officials (CASA), Restaurant Association, any organization representing the local Chambers of Commerce).

Draft Technical Guidance 3 – Public Water Supply Manual, Part IV- Noncommunity Design Standards

TAC offered the following comments on this pre-draft guidance:

- Include language that this guidance applies only to noncommunity systems with groundwater sources – those with Surface Water/Groundwater Under Direct Influence of Surface Water sources need to follow the standards in Part II.
- TAC requested the pre-draft document with revisions be sent to them for review.

Draft Technical Guidance 4 – Lead and Copper Rule (LCR) – A Working Guide

TAC offered the following comments on this pre-draft guidance:

- Clarify that, under the LCR, source water monitoring is actually monitoring at the entry point (EP).
- Define “WQP” (Water Quality Parameter) in the flow chart and clarify that Initial Monitoring for WQPs is for different parameters than monitoring that is conducted after Corrosion Control Treatment (CCT) has been installed.
- Under the Public Education requirements, clarify that the insert on the water bill is continuous (with each bill) as long as the lead Action Level (AL) is exceeded.
- Explain wherever possible the significance of the 1982/1983 dates for sample site selection and whether alternate sites need to be in close proximity to the original sampling location.

- Explain what is required/expected when there are an insufficient number of Tier 1 sample sites because homeowners refuse to participate in the sampling effort.
- The guidance needs to recognize newer technologies to inform the public under the PE program.
- Clarify who may conduct WQP testing.
- Clarify partial Lead Service Line replacement & what is considered lead plasticizers for the 9-year waiver.
- Fix broken links to other guidance documents & resources.

Draft Technical Guidance 5 – Water Quality Parameter Reporting Instructions

TAC offered the following comments on this pre-draft guidance:

- Clarify that, under the LCR, source water monitoring is actually monitoring conducted at the entry point (same as for Draft Guidance 4).
- Verify which WQPs must be measured immediately in the field (i.e. within 15 minutes) from those that may be analyzed in a lab if properly preserved.
- Provide additional details to explain what constitutes a WQP violation and that the “more than 9 days” is within a *6-month* period.
- Explain the difference between an accredited lab and a registered lab.

Adjourn

Doug Crawshaw made a motion to adjourn. The motion passed by a unanimous vote; the meeting adjourned at 1:30 PM.