

SUEZ WATER PENNSYLVANIA
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Summary of Comments Regarding Proposed Rulemaking [25 PA Code Ch. 109] Safe Drinking Water Revised Total Coliform Rule

Sample Site Plans – Section 109.701(a)(5)

A Standard Operating Procedure (SOP) as allowed by the federal rule [40CFR 141.853(a)(5)(i)] should be used as a more efficient method for PWS to clearly identify the standards for selecting repeat sampling locations while allowing the PWS the flexibility to use to choose the most representative sites available at the point in time that the repeat samples are needed. The SOP would also identify the schedule for collecting routine samples and standards for sampling accessibility. In Section 109.701(a)(5) the word “available” should remain in the regulation language regarding check sample locations. Sampling site plans must be flexible and may need to be updated frequently and therefore should be kept in electronic format to prevent the need to distribute multiple copies of the plan. Finally, any changes made to DWELR to make accommodations for this new rule should not impact the existing three digit sample site IDs.

Alternate Repeat Sample Locations –Preamble Section I.

An SOP should be used to identify the location alternate repeat sample locations as needed. An SOP as allowed by the federal rule [40CFR 141.853(a)(5)(i)] will provide a sound framework for public water systems to comply with RTCR without dramatically increasing the time spent on developing sampling sites plans and administrative burden for maintaining these plans.

Level 1 Assessment Triggers – Section 109.202(4)(iii)

Although examinations of the circumstances surrounding other water quality issues are warranted, it could be confusing for suppliers and possibly regulators to use the same assessments for multiple situations not associated with this regulation.

Public Notification of MCL Violation – Section 109.409(b)(1)

The notification requirement to DEP regarding an E. coli positive result should reflect the end of the day requirement in the federal rule. In addition, the PWS should be able to use DEP’s 24 hour emergency number to meet this notification requirement.

Level 1 and Level Assessments – Section 109.705(b)(2)

Suez Water would like to be able to submit level 1 and 2 assessments to DEP electronically.

Compliance Cost – Preamble Section F.

The regulations as proposed with detailed sampling plans including repeat sample locations, accessibility information, and monitoring schedules require an increased administrative burden which will impact staffing costs for PWS.