

January 18, 2018

Ms. Catherine McManus, Acting Director
Water Protection Division
United States Environmental
Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Update on Performance of Pennsylvania's Safe Drinking Water Program

Dear Ms. McManus:

This letter is intended to provide you with an update on the performance of Pennsylvania's Safe Drinking Water Program during the interim period until the General Update and Fee rulemaking is promulgated and new staff are hired and trained. This update covers July – September and October – December of 2017.

1. **Sanitarian Staffing Levels:** The following table provides an update on the current staffing levels for sanitarians (field inspectors):

	No. Sanitarians	No. Trainees	No. Vacancies	Total No. Positions
Feb 2017	43	11	7	61
June 2017	43	12	7	62
Nov 2017	41	14	7	62

Note: Due to the turnover of entry level positions, it is a continual process to post and fill new sanitarian/trainee vacancies.

2. **Sanitary Surveys:** The following table provides a summary of the number of sanitary surveys (full inspections) conducted and whether violations were identified.

	Sanitary Surveys			Total No. Violations Identified
	Total No. San Surveys	No. With Violations	No. Without Violations	
Apr – June 2017	527	243 (46%)	284 (54%)	282
Jul – Sept 2017	443	202 (46%)	241 (54%)	209
Oct – Dec 2017	377	218 (58%)	159 (42%)	195

Note: Due to the size of the reports, the inspection details for April – June were conveyed to EPA via email on August 30, 2017. The inspection details for July – September and October – December are attached to the electronic transmission of this letter.

3. Interim Measures to Improve Program Performance: The Department conducted the following activities during the July through December 2017 timeframe:

- The Department continued to oversee the training plans for new staff, track progress, and ensure completion of on-the-job training.
- The Department held statewide meetings/conference calls with Sanitarian Supervisors, Operations Chiefs and Program Managers on July 19, September 6 – 7, November 1 – 2 and 15, 2017 to discuss implementation issues and ensure statewide consistency.

In November, the Department received approval from the Governor’s Budget Office to use unspent state monies as a temporary funding source to fund additional positions for Safe Drinking Water until the new fees are promulgated. The new positions will include 17 new sanitarians/trainees. The new positions will reduce the workload for each of the DEP regions to levels that are within the recommended range of 100 – 125 public water systems (PWS)/sanitarian (based on a workload analysis).

	DEP Region					
	1-SERO	2-NERO	3-SCRO	4-NCRO	5-SWRO	6-NWRO
Sanitarian Workload with New Positions (No. PWSs/San)	112	108	112	112	95	107

The Department is in the process of completing the necessary steps to create and post the new positions. It is anticipated that the new sanitarian positions will be filled by March of 2018.

4. Status of the Department's Action Plan:

DEP Action Plan to Address Funding and Resource Shortfall and Improve Performance			
Item	Description	Anticipated Schedule	Status
1	Present proposed General Update and Fee rulemaking to EQB for approval to move forward	May 2017	Completed May 17, 2017
2	Publish proposed rulemaking in <i>PA Bulletin</i> for public comment	July 2017	Completed Aug 26, 2017
3	Investigate and secure temporary funding to hire new staff until fees are in place	By end of 2017	Completed Nov 2017
4	Complete steps to create, post and hire 17 new sanitarians/trainees	March 2018	
5	Present final General Update and Fee rulemaking to EQB for approval	April 2018	
6	Train new staff	Apr – Dec 2018	
7	Publish final General Update and Fee rulemaking in <i>PA Bulletin</i>	July 2018	

If you have any questions about this update, please feel free to contact me by e-mail at ldaniels@pa.gov or by telephone at 717.787.9633.

Sincerely,

Lisa Daniels
Director