

February 26, 2026

Edgar Chescattie
Director
Bureau of Safe Drinking Water
P.O. Box 8467
Harrisburg, PA 17105-8467

Dear Ed:

The Public Water System Technical Assistance Center (PWS-TAC) Board met on February 12, 2026, to review the Department's proposed regulations for the Lead & Copper Rule Improvements (LCRI).

The PWS-TAC Board would like to make the following recommendations concerning these Chapter 109 revisions.

1. The definition of Connector should be edited to add the following text as the 2nd sentence: "The connector may be made from a variety of materials."

The revised definition would be "Connector—Also referred to as a gooseneck or pigtail, is a short segment of piping, not exceeding 3 feet, which can be bent and used for connections between service piping. The connector may be made from a variety of materials. Lead connectors exceeding 3 feet are considered to be part of a lead service line. Lead connectors may result in a galvanized service line needing replacement if the lead connector is upstream of the galvanized line."

The motion passed by a unanimous "Yay" vote.

2. DEP should work with EPA to ensure clarity and strong language in technical guidance on how the 90th percentile value is to be calculated when more than the minimum number of samples are received from lower Tier sites and are analyzed and reported. The guidance should include examples of what sample results are to be ranked and included in the calculation, especially when results from Tier 3, 4 or 5 sites that are not included in the calculation are higher than results from Tier 1 or 2 sites.

The motion passed by a unanimous "Yay" vote.

3. Subparagraph (iv) in § 109.1102(b)(1.1), which reads "Large water systems with CCT that exceed the lead PQL but do not exceed the lead or copper action level may be required by the Department to complete the reoptimized OCCT steps in paragraph (2.1)." should be deleted because DEP has the authority under subparagraph (ii) to require water systems to reoptimize OCCT. DEP should also create written SOPs and training for staff to ensure consistent implementation in determining when systems should be required to reoptimize OCCT.

The motion passed: 11 "Yays" and 5 abstentions.

4. In the schedule for OCCT outlined in paragraphs §§ 109.1102 (b)(2.1) and (b)(2.2), DEP should combine *Step 2 – Complete a CCT feasibility study for reoptimization* with *Step 3 – Obtain a permit for construction or modification of OCCT* to show DEP is consistent with the federal timeline of 36 months.

The motion passed by a unanimous “Yay” vote.

5. The WQP monitoring language in § 109.1103(b.1) that states “from taps used to provide water for human consumption” should be changed to match the federal language.

The motion passed: 15 “Yays” and 1 abstention.

6. DEP and EPA should work with their respective Departments of Education and Human Services in creating a marketing/communications and notification plan including templates (in English and Spanish), for sampling in schools and child care facilities to assist PWSs in meeting the LCRI requirements for notification and sampling in schools and child care facilities.

The motion passed by a unanimous “Yay” vote.

The PWS-TAC Board acknowledges the efforts of the Department in developing this proposed rulemaking and the members look forward to working with the Department as these regulations are finalized.

Sincerely,



Sharon Fillmann
Chairperson
Public Water System Technical Assistance Center Board

cc: PWS-TAC Board Members