

# Drinking Water News

A Newsletter for Pennsylvania's Public Water Systems

Published by the Pa. Department of Environmental Protection

Summer 2010

## Lead and Copper Rule (LCR) Reminders

Dawn Hissner, DEP Operations Monitoring and Training

Community and nontransient, noncommunity (NTNC) water systems on an annual or triennial lead and copper monitoring frequency are required to conduct their lead and copper tap sampling during June-September this year. Now is a good time to dust off your LCR Sample Site Plan and determine whether it needs to be updated. Homeowners may choose to drop out of your sampling pool, so verify which homes are still participating and identify alternate locations before you distribute the sample bottles. Alternate sampling locations should be from the same tier as the location that is being replaced. Changes to the pool of available sampling locations and the sample procedure certification form completed by the individuals that will collect the samples should be updated and added to the Sample Site plan. A copy of the revised plan should be submitted to your local DEP office by the end of the monitoring period.



Once you have collected the samples, be sure to provide the complete sample information to the lab so the results are reported properly. Labs are required to report both the 90<sup>th</sup> percentile values and the individual tap sample results, so they need accurate information about each sample to prevent reporting errors. Talk to your lab.

New this year is the requirement to provide a Consumer Tap Notice to each sampling location. Within 30 days of receiving the results of your tap sampling, you must provide a notice of the individual lead results to the consumers whose taps are sampled. There are specific content requirements for the notice, so EPA has developed templates water suppliers can use to fulfill this requirement. Use this link to access EPA public education guidance documents: [http://www.epa.gov/safewater/lcrr/compliancehelp\\_draftguidance.html](http://www.epa.gov/safewater/lcrr/compliancehelp_draftguidance.html). There are separate manuals for community and NTNC systems. The tap notice templates are in the appendices. *Remember to submit a certification (with a copy of the notice) to your local DEP office by December 31, 2010.*



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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## Public Notification (PN) Questions & Answers

Deb Rotz, DEP Operations Monitoring and Training

The Department has completed 19 training sessions on the recent Public Notification requirement revisions for more than 600 attendees. In order to clarify issues that have been raised during the training sessions, DEP is posting a "2010 PN Revisions Training Questions and Answers" document on its PN website. Here's one of the questions found in the document.

**Question:** Can water suppliers who lack a website use the DEP website for posting the entire PN?

**Answer:** No. Water suppliers will not be able to post their Tier 1 PN on DEP's website. However, they may want to ask their local municipality or county emergency management coordinator if their Tier 1 PN could be posted on a local or county website. Pennsylvania Rural Water Association (PRWA) has offered to post water supplier Tier 1 PNs on their website for systems who do not have their own website. For more information about this offer, contact PRWA at 814-353-9302. To assist water suppliers in creating a free website, here's a link: <http://www.webs.com/>

To view the entire Q & A document, please visit the PN website at its new link:

[http://www.portal.state.pa.us/portal/server.pt/community/public\\_drinking\\_water/10549/public\\_notification/553901](http://www.portal.state.pa.us/portal/server.pt/community/public_drinking_water/10549/public_notification/553901)

## Protect Your Groundwater Source: The First Step toward Providing Safe Water

Cathy Port, DEP SCRO

(photos by Jeff Yorty, DEP SCRO)

Your drinking water well – it's a silent sentinel -- the first line of defense in protecting your drinking water from contamination. You can reap long term dividends by preventing contamination from reaching your drinking water source. Wellhead protection will save you time and money by preventing treatment requirements and reducing monitoring requirements as well as the associated costs.

Many wells at public drinking water systems were drilled years ago, before the existing well construction standards were in place. So does that mean that nothing can be done to improve your wellhead protection? Absolutely not! There are a lot of steps you can take to improve the protection of your well source.

Take a walk out to your well. With a critical eye, look at all of the potential sources of contamination within a 100 foot radius. This includes things like:

- Dumpsters or Grease Tanks
- Fuel or solvent storage
- Pesticide/Herbicide storage or application areas
- Wastewater holding or treatment facilities
- Surface water drainage

Can any of these potential sources of contamination be moved, modified, or monitored more closely to prevent an accidental release?

Next, look closely at the well itself. Do you know if the space between the casing and the drilled hole has been sealed with grout? If not, there's a potential that water washing off the parking lot or the ground (dissolving contaminants along the way) can trickle down the outside of the casing directly into your drinking water aquifer (the rock unit that stores and transmits water into the well). Correcting this problem after the fact may be difficult to impossible and requires the services of a well driller.



You can minimize surface water drainage from washing toward your well. First, be sure that your well is protected from drainage and flooding. Look at how the area around the well is graded. Surface water should drain away, not toward the well. Correcting this problem can be as easy as re-grading the area around the well. Next, look at the vertical extent of the casing. Low well

casings or wells in pits increase the possibility of surface water flooding -- another way for those chemical and biological contaminants to reach your drinking water source. This problem can be corrected by raising the well casing (welding on an extension) or, if the well is in a pit, raising the casing, installing a pitless adaptor, and filling in the pit. The picture below shows an example of a well that was upgraded to conform to current standards and provide increased protection of the drinking water source.



Next, look to see if your well is susceptible to assault by vehicles or heavy equipment (snowplows, lawn equipment, excavation equipment, etc.). One minor accident could wipe out your drinking water source permanently. Sturdy barriers, visible markers, and general awareness can prevent this type of disaster.

Finally, look to see if your well is susceptible to tampering or vermin infestation? If your well is not secured, it is susceptible to tampering – whether it's a disgruntled customer or a curious child, tampering still has the potential to contaminate your drinking water source as well as the aquifer itself. An easy solution is to install a locking cap. If your well does not have a sanitary seal cap, it is susceptible to vermin infestation by insects or small rodents. An easy solution is to install a vented sanitary seal cap with gaskets that seal off all possible entryways to the well – where the cap meets the top of the casing and where the pump wires feed through the cap. Keeping vermin and their contaminants out of your water supply is much easier than having to treat the problems after the fact.

As a public water supplier, you are well aware of the monitoring requirements and drinking water standards you need to meet. What you may not know is that taking steps to protect your source will yield huge dividends. Sure you can provide treatment for your drinking water, but installing and maintaining treatment is expensive. Plus, treatment systems can fail, exposing your customers to potentially harmful contaminants. So if you pay attention to protecting your source, not only will you be protecting your drinking water and reducing your treatment requirements, but you will be protecting the aquifer you share with other users into the future.

## Regulatory Update

Progress was made on a number of regulatory packages related to Chapter 109. Training is being designed and scheduled for three new regulatory packages. Activities continue on the others as shown in the updated schedule below. Water suppliers can participate in the rulemaking process by commenting on proposed regulatory packages and providing input through professional organizations and advisory committees. Learn more about the proposed rules on DEP's Public Participation Web page: <http://www.depweb.state.pa.us>, (keyword: Public Participation).

Proposed Regulations still going through the approval and adoption process		
Regulation	Rule Summary	DEP Schedule
<b>Operator Certification</b>	<p><sup>3</sup>/<sub>4</sub> Will implement provisions of Act 11 of 2002, the Water and Wastewater Systems Operator's Certification Act and insure continued compliance with USEPA requirements.</p> <p><sup>3</sup>/<sub>4</sub> Will formalize requirements for testing, training and experience to become certified and maintain certification.</p> <p><sup>3</sup>/<sub>4</sub> Will enhance system security by requiring operator criminal history records from the PA State Police as a certification condition and security training for certificate renewal.</p> <p><sup>3</sup>/<sub>4</sub> Will eliminate remaining Chapters 301, 303 and 305 provisions.</p> <p>Contact: Nicki Kasi, 717-772-4053</p>	<p><b>June 15, 2010</b> Final rule approved by the EQB</p> <p><b>Before the end of 2010</b> Final rule expected to be published in the <i>PA Bulletin</i></p>
<b>Lead and Copper Rule Short Term Revisions (LCRSTR)</b>	<p><sup>3</sup>/<sub>4</sub> Will incorporate federal requirements to strengthen existing Lead and Copper Rule requirements regarding monitoring, treatment processes, public education, customer awareness and lead service line replacement</p> <p>Contact: Dawn Hissner, 717-787-0130</p>	<p><b>June 18, 2010</b> Final rulemaking approved by the TAC</p> <p><b>October 19, 2010</b> Anticipated presentation on Final Rulemaking to the EQB</p>
<b>Fees</b>	<p><sup>3</sup>/<sub>4</sub> Will amend fees to cover department costs</p> <p>Contact: Kevin McLeary, 717-772-4464 Lisa Daniels, 717-772-4046</p>	<p><b>March 9 &amp; June 18, 2010</b> Received comments from TAC</p> <p><b>October 19, 2010</b> Anticipated presentation on Proposed Rulemaking to the EQB</p>

Continuing efforts related to recently adopted regulations		
Regulation	Rule Summary	DEP Schedule
<b>General Update to Chapter 109</b>	<p><sup>3</sup>/<sub>4</sub> Incorporates necessary federal requirements to obtain and/or maintain primacy for the Phase II/V, Filter Backwash Recycling, Lead and Copper, and Radionuclide Rules</p> <p><sup>3</sup>/<sub>4</sub> Amends sections to improve data quality and compliance.</p> <p><sup>3</sup>/<sub>4</sub> Mandates electronic reporting to DEP</p> <p>Contact: Lisa Daniels, 717-772-4046</p>	<p><b>July &amp; August 2010</b> Training will be scheduled across the state. Contact your regional DEP office for details on specific dates and locations.</p> <p>Contact PA Rural Water Assoc. at (814) 353-9302 ext. 107</p>
<b>Groundwater Rule</b>	<p><sup>3</sup>/<sub>4</sub> Incorporates EPA's Ground Water Rule to provide for increased protection against microbial pathogens in public water systems that use ground water sources.</p> <p>Contact: John Piekara, 717-772-4061</p>	<p><b>September &amp; October 2010</b> Training will be scheduled across the state. Contact your regional DEP office for details on specific dates and locations.</p>
<b>Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR)</b>	<p><sup>3</sup>/<sub>4</sub> Incorporates EPA's Stage 2 DBPR.</p> <p><sup>3</sup>/<sub>4</sub> Requires community and noncommunity water systems that treat drinking water with a primary disinfectant other than UV to conduct additional compliance monitoring for trihalomethanes and haloacetic acids.</p> <p>Contact: Godfrey Maduka, 717-783-7088</p>	<p><b>Spring 2011</b> Training anticipated across the state. More information at the beginning of 2011.</p>

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## Chlorine's Role in New Rules

Stephanie Wharton, DEP NCRO

Pennsylvania recently published several new regulations: the Groundwater Rule (GWR), the Long Term 2 Enhanced Surface Water Treatment Rule (LT2), and the Stage 2 Disinfectants and Disinfection Byproducts Rule (ST2). Chlorine - the most common disinfectant - plays an integral role in all three of these rules. The GWR and LT2 emphasize chlorine's role in protecting consumers from microbial contamination; however, the ST2 has evolved to protect consumers from associated potential harmful effects.

The GWR's goal is to increase protection against pathogens and reduce the risk of illness caused by microbial contamination in public water systems that use ground water. The rule requires community water systems to provide 4-log inactivation/removal of viruses. For the majority of these systems, effective contact time takes into account the time the water is in contact with chlorine. The system demonstrates that they meet the 4-log inactivation/removal of viruses by maintaining specific chlorine residuals at the entry point.

Chlorine also plays a part in the LT2. Water systems served by surface or GUDI sources monitor their raw



water for *Cryptosporidium*. The system is placed into a bin classification, determined by the level of cryptosporidium found in the system's source water. The bin classification determines if any additional log removal is required. This is an instance where the system cannot simply raise the amount of chlorine the system is feeding. Chlorine has little impact on the inactivation of *Cryptosporidium*, requiring more of a treatment technique change to meet the requirements of the rule.

The ST2 requires the monitoring of TTHM/HAA5 throughout the public water system's distribution system to increase public health protection by reducing the potential risk of adverse health effects associated with disinfection byproducts (DBPs). DBPs are chemical compounds formed when chlorine is added to water with organic material in it. All natural waters have some organic material in them, and generally waters that are more turbid have more organic material. DBPs are a concern whenever chlorine is added to drinking water. Some studies have suggested that ingestion of DBPs in water over a lifetime may be associated with a very low risk of cancer. However, this risk is very small.

Even though new regulations are being implemented and treatment techniques evolve, chlorine remains crucial in protecting public health.

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## Consumer Confidence Report (CCR) Template Revisions

Deb Rotz, DEP Operations Monitoring and Training

The Department has revised two CCR template and instruction packets (one for surface water and another for groundwater) for you to use when creating or revising your CCR. The revised instructions and templates include the following new information:

- A searchable table of contents with links to topics. (You may need to click on "Document Map" under the "View" tool bar to activate the links.)
- Information about locating and completing source water assessment summary information.
- A table of contaminants that do not require a unit conversion.
- A units of measurement relationship visual.
- Variables used to report detected compliance values.
- Steps to calculate the average of multiple values.

- Steps for computing and reporting a running annual average.
- Radiological reporting information.
- Revised mandatory lead information language.
- A note regarding e-mail as an acceptable form of direct delivery.

Since DEP is allowing water suppliers to use e-mail as a form of direct delivery for public notices, DEP is now also allowing water suppliers to e-mail their CCRs to customers who provide e-mail addresses to save postal costs. However, it's important that you still mail a hard copy of your CCR to DEP, unless you receive permission to e-mail it to your local DEP sanitarian.



To access both templates, go to:

[http://www.depweb.state.pa.us/portal/server.pt/community/public\\_drinking\\_water/10549/consumer\\_confidence\\_reports/53926](http://www.depweb.state.pa.us/portal/server.pt/community/public_drinking_water/10549/consumer_confidence_reports/53926)

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## Water Supply Vandalism Leads to Criminal Charges

Rodney Nesmith, DEP SCRO

Any person who endangers the health of others by knowingly introducing any contaminant into a public water system or tampering with a public water system violates state and federal laws and is subject to prosecution. In addition to the threat to public health, such instances can create operations and maintenance nightmares for operators and undermine public confidence in the safety of our drinking water supplies. A recent incident in the Southcentral Region shows, even on a relatively small scale, the serious ramifications that can result from tampering with public water supplies.



On January 29, 2010, maintenance personnel at Bedford County high school discovered that vandals had gained access to a water storage tank and placed three bags of unknown material into the water.

School officials immediately contacted DEP, who dispatched emergency response staff to the site. The Pennsylvania State Police and USEPA Criminal Investigation Division also responded.

Because the contents of the bags in the water were unknown, DEP advised school district officials to issue a modified Do Not Use advisory. No water was to be used for any consumptive or contact purposes; water could only be used to operate toilet facilities. The district had to provide bottled water and discard food made for student lunches. Students were bussed to

other schools for their meals. The district also provided notice to parents and the community.

The level of concern was mildly tempered when investigators discovered the bags contained wood chips from the high school wood shop; however, DEP analysis of water from the tank soon found it contained unacceptable levels of tetrahydrofuran (THF). THF is a water-soluble component of wood finishing products. As a result of the contamination, the district had to drain and thoroughly clean its water facilities and had to operate without potable water until February 4.

Video surveillance from the property revealed five juvenile students who were identified as having knowledge of the incident. Three felony arrests were filed for Institutional Vandalism/Tampering with the water supply. The total restitution for the responsible actors was \$14,614.73, which included \$5,706.94 paid to the Department as cost reimbursement and civil penalty.



The Department assessed a civil penalty against the school district because they failed to properly protect and manage their public water supply. During two recent inspections, DEP had advised the district to lock the roof access hatch to the storage tank; however, that was never done. Because the hatch was not locked, several juveniles were able to gain easy access to the water supply.

This incident demonstrates how quickly severe consequences can occur, the level of effort needed to recover, the ramifications for the perpetrators, and the value of preventative measures.

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## 2010 Summer Dry Conditions in Pennsylvania

The Pennsylvania Department of Environmental Protection (DEP) relies on a number of parameters to monitor water supply drought conditions, precipitation, stream flows, ground water levels, and the Palmer Drought Severity Index. The United State Geological Survey (USGS) maintains a website for DEP that displays the current status of these parameters at the following link: <http://pa.water.usgs.gov/monitor/>



These parameters are used as indicators of the four stages of drought that Pennsylvania uses for drought management – normal, watch, warning and emergency. Actual declarations of any

particular drought stage in a given county are based upon a review of these parameters in combination with other considerations.

A lack of rain over the past 90 days has created a precipitation deficit of approximately 3 inches in the central portion of the state, and stream flows and groundwater levels are indicating stress.

Stream flow indicators for seven counties are at a warning level and for 14 counties are at a watch level. Groundwater levels show stress with indicators in watch or warning status for predominantly the northeast and one groundwater well indicator at emergency (Schuylkill).

For current drought conditions, visit the USGS Pennsylvania Water Science Center webpage: <http://pa.water.usgs.gov/monitor/palmer/index.html>

## Reminder for Accredited Labs ..... Jeff Allgyer, DEP Operations Monitoring and Training

Accredited labs received a letter in May 2010 regarding changes to the analytical method codes used to report total coliform, fecal coliform and *E. coli*. This table summarizes the changes and provides start dates for using the new codes.

<b>CONTAMINANT AND METHOD CODES FOR REPORTING COLIFORM AND <i>E. COLI</i> MONITORING RESULTS</b>						
Parameter Name	Parameter ID	EPA Analysis Method	DEP Method Code		Applies to	
			Before 7/1/2010	On or After 7/1/2010	TCR	GWR
<b>Two-Step Process - Determine presence of Total Coliform; if present, analyze for Fecal Coliform</b>						
Fecal Coliform (Total Coliform)	3113 (3100)	Membrane Filtration with m-Endo SM 9222B + SM 9221E verification	303	325	9	
		Multiple Tube Fermentation SM 9221B + SM 9221E verification	307	326	9	
		Presence-Absence with P-A broth SM 9221D + SM 9221E verification	309	328	9	
<b>Two-Step Process - Determine presence of Total Coliform; if present, analyze for <i>E. coli</i>.</b>						
<i>E. coli</i> (Total Coliform)	3114 (3100)	Membrane Filtration with m-Endo SM 9222B + SM 9222G verification or SM 9221F	303	323	9	9
		Multiple Tube Fermentation SM 9221B + SM 9221F verification	307	327	9	9
		Presence-Absence with P-A broth SM 9221D+ SM 9221F verification	309	329	9	9
<b>Simultaneous Detection of Total Coliform and <i>E. coli</i>.</b>						
<i>E. coli</i>	3114	Membrane Filtration with MI Agar	304	324	9	9
		MMO-MUG (Colilert/Colilert 18) / SM 9223B	311	331	9	9
		Colisure	312	332	9	9
		m-ColiBlue24®	313	333	9	9
		E*Colite®	314	334	9	9
		Readycult® Coliforms 100 Presence/Absence Test	317	337	9	9
		Membrane Filter using Chromocult® Coliform Agar	318	338	9	9
Colitag / Modified Colitag	319	339	9	9		
<b>Simultaneous Detection of Total Coliform and <i>E. coli</i>.</b>						
Total Coliform	3100	Membrane Filtration with MI Agar	304	324	9	
		MMO-MUG (Colilert) / SM 9223B	311	331	9	
		Colisure	312	332	9	
		m-ColiBlue24®	313	333	9	
		E*Colite®	314	334	9	
		Readycult® Coliforms 100 Presence/Absence Test	317	337	9	
		Membrane Filter using Chromocult® Coliform Agar	318	338	9	
		Colitag / Modified Colitag	319	339	9	

Notes: TCR = Total Coliform Rule; GWR = Groundwater Rule

'Two-Step Process' methods: Either Total Coliform or *E. coli*. may be reported for the GWR.

'Simultaneous Detection' methods: *E. coli*. must be reported for GWR. Not all methods are applicable to GWR samples.

'Before' method codes: TCR check samples and GWR triggered monitoring samples, taken on or after July 1, in response to a TC positive which was collected in June must be reported using the 'Before' method codes.

'After' method codes: Routine TCR samples collected on or after 7/1/2010 must be reported using the 'After' method codes. GWR triggered monitoring samples taken on or after 7/1/2010 in response to a TC positive collected in July, must be reported using the 'After' method codes.

## Errors and Warnings in DWELR

Jennifer Brock, Data Systems and Analysis

Errors on SDWA sample reports will cause reporting violations for water systems. DWELR has dramatically reduced the errors on reported sample results but there are a few key areas where these violations can be further reduced.

SDWA Form	This Submission		All Submissions This Reporting Period
	# Records	# Records with Errors/Warnings	# Records with Errors/Warnings
SDWA1	0	0	1
SDWA4	0	0	0
SDWA4U	0	0	0
SDWAS	0	0	0
SDWAPbCu	0	0	0
SDWAS	1	1	1

When sample results are submitted, the DWELR Submission Confirmation screen tells the user if there is an error. In the example on the left, (a) shows that there is an error on the SDWA-S form that was just submitted. A previously submitted SDWA-1 form also has an error (b). Previous submissions include submissions by anyone from the same lab.

Details of errors or warnings are displayed on the 'Error Report.' Users can go there directly from this confirmation page by clicking on the blue form name

or on the blue number in the errors/warnings column. DWELR submitters will receive email reminders on the 1<sup>st</sup>, 5<sup>th</sup>, and 9<sup>th</sup> of each month if any uncorrected errors and warnings remain in their submission.

How to view the Error Report: A current 'Error Report' is available at any time via the blue navigation bar at the bottom of each screen or from the main menu. The report opens on the SDWA-1 form but it is important to look at all forms. Across the bottom of the report is a list of all the forms and the number of records of each form which have error or warning messages. The warning example below shows the same two records (circled) as the Submission Confirmation above.

	PWSID	Contam ID	Analysis Method	Result	Analysis Date	Location ID 1	Location ID 2	Sample Date	Sample Type
	Sort							Sort	
***Warning: Chlorine result high check data entry***									
	9999999	0999	301	13.6	051910	101		051910	E
Edit Selected Records									
	SDWA 1 (1)	SDWA 4 (0)	SDWA 4U (0)	SDWA 5 (0)	SDWA PbCu (0)	SDWA S (1)			

Water systems can view the "Error Report" of all records submitted with their PWSID. If you, as a water system, find an error, contact the submitting lab. They are the only DWELR users who can make the correction.

The Submission Confirmation and Error Report screens both contain errors and warnings. Unlike errors, warnings do not

cause reporting violations. Warnings are designed to highlight possible data entry errors - such as the chlorine result (\*) shown above and to remind submitters of any other actions which might be required, such as submitting individual positive Coliform records and their check samples.

DWELR records can be corrected from either the View/Edit or the Error Report screens. From either screen, check the box by the PWSID and then click on the 'Edit Selected Records' button to open the record for editing. Errors which are not corrected while the record is still in DWELR must be corrected using the old-fashioned paper method.

### Types of Errors

Typographical Errors Examples include transposing data such as typing the year as 01 instead of 10 (as shown to the right), or missing or misplacing a decimal point and changing a result by a factor of ten (as seen in the "Result" column in the example above).

Incorrect Information Provided to the Lab Examples are invalid entry point, invalid source ID and incorrect sample type. These errors are difficult for a lab to correct. It is the responsibility of the water system to give the lab the information needed to report analysis results correctly.

Incorrect Laboratory Reporting Analyte and method codes, along with details on how to complete the SDWA forms, are available through the laboratory reporting instructions. This information is for both accredited labs and non-accredited labs.

Last Sample Date	Lab ID	No. of Check Samples Taken	Loc/EP ID	Sample Period Begin Date	Sample Period End Date
	Sort				
050301	00001	0		050110	053110

Errors Not Found by DWELR Incorrect, but valid, entry points and incorrect PWSID numbers can not be detected by DWELR. These errors usually result from the water system giving their lab incomplete or inaccurate information and are generally not found until the water system receives a violation.

Some additional sources of information include:

- ¾ Lab Reporting Instructions in DEP's e-library:
  - DEP's e-library under Technical Guidance Final Documents the searching for Lab Reporting.
  - <http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-10733>.

<b>Laboratory Reporting Instructions</b>	
<b>Rule, Regulation, or Topic</b>	<b>Document Number*</b>
Lead and Copper Under the Lead and Copper Rule	383-3301-107
Disinfectant Residuals, Disinfection Byproducts and Precursors	383-3301-306
Chemical Contaminants in Drinking Water Distribution Systems	383-3301-105
Total and Fecal Coliform Bacteria in Public Drinking Water Distribution Systems	383-3301-102
Radiological Contaminants in Drinking Water Distribution Systems	383-3301-205
Turbidity Reporting Instructions for PWSs Using Filtered Surface Water or Groundwater Under the Direct Influence of Surface Water (GUDI) Sources	383-3301-106

\* Most of these documents are undergoing revisions due to recently promulgated rules.

- ¾ Drinking Water Reporting System: Inventory, Monitoring Requirements, Historic Sampling and Violation Information.
  - <http://www.drinkingwater.state.pa.us/dwrs/html/>.
  - Or DEP website using the keyword DWRS.
- ¾ Correction forms and instructions in DEP's e-library
  - DEP's e-library under FORMS and search for SDWA or collection 10686.
  - <http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-10686>.

Laboratories and water systems with questions about DWELR can contact the Bureau of Water Standards and Facility Regulations' Data Systems and Analysis Division at (717) 787-6744.

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## **From the Editor's Desk** *Joanne Nardone, DEP Operations Monitoring and Training Division*

"Drinking Water News" is now an "e-newsletter." Announcements of releases and links to the newsletter will be sent to PWS non-emergency e-mail addresses listed in PADWIS and to the e-mail addresses we have for PA-certified labs. If future newsletter availability notices should go to other addresses, please send a list of those addresses to me at [jonardone@state.pa.us](mailto:jonardone@state.pa.us) . Please help us share the word that "Drinking Water News" can be found on DEP's Web site at [http://www.depweb.state.pa.us/portal/server.pt/community/public\\_drinking\\_water/10549](http://www.depweb.state.pa.us/portal/server.pt/community/public_drinking_water/10549) . If you cannot access the Internet, submit a current address to Joanne Nardone at the DEP Bureau of Water Supply and Facility Regulation, 400 Market St., Harrisburg, PA 17109-8467. Limited hard copies may be available. The newsletter is scheduled to be produced twice a year.

DEP's Drinking Water Program staff has been kept very busy with regulatory activities during 2009 and the first half of 2010. The tables on page 3 summarize those efforts. Regulations affecting Public Notification, Stage 2 Disinfectants and Disinfection Byproduct Rule revisions, Enhanced Treatment for Cryptosporidium, the Groundwater Rule, and Chapter 109 updates necessary for DEP to maintain primacy have all been finalized and training is being prepared and scheduled with information needed by water suppliers, operators and certified laboratories. Regulations related to Operator Certification, short-term revisions to the Lead and Copper Rule, and Fees necessary to administer the Drinking Water Program in Pennsylvania are still making their way through the approval process.

We hope you can take advantage of the training and the related discussions and exchanges of ideas that they generate. .... And Thank You for providing clean, safe drinking water to so many Pennsylvania citizens and visitors!

*Joanne*

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## DEP'S PUBLIC PARTICIPATION CENTER

Jeffrey Yorty, DEP Lancaster District Office

Water supply operators, managers, and public officials can keep track of all the changes to the Pennsylvania Safe Drinking Water rules and regulations (Chapter 109) through the DEP Public Participation Center ([http://www.portal.state.pa.us/portal/server.pt/community/public\\_participation\\_center/14004](http://www.portal.state.pa.us/portal/server.pt/community/public_participation_center/14004)).

The Center is a one-stop center for information about proposed DEP regulations, policies and other proposals open for public comment, as well as final published documents. You can also learn about environmental

legislation now in the General Assembly. At the Center you can not only get copies of DEP proposals, but you can also learn when advisory committees are scheduled to take up issues, check the status of legislation and regulations, learn about regulations and policies under development, and get to know key people in the processes.

A list of topic areas found at the Public Participation Center site is listed in the table below. The Pa Code Chapter 109 Rules and Regulations related to drinking water can also be found at: <http://www.pacode.com/secure/data/025/chapter109/chap109toc.html>

DEP Public Participation Center	
Information Category	Category Content
<b>Newsroom</b>	Current news releases and clippings on a variety of environmental topics
<b>eNOTICE</b>	DEP's electronic notification system. Users can subscribe to eNOTICE, select items they wish to receive email notices about when changes occur in the status of the particular item, or when new items are available for viewing. eNOTICES covering Permit Applications are processed daily, while Draft Technical Document eNOTICES are processed weekly.
<b>Calendar of Events</b>	Current events of a variety of environmental topics
<b>Technical Guidance</b>	Connects to the DEP eLibrary, for Draft and Final Technical Guidance documents. Users may submit comments for Draft Guidance Documents. For Final Documents, choose "Water Standards and Facility Regulation".
<b>Proposals</b>	Choose "Proposals currently open for public comment", "Closed comment periods", or "Proposals recently finalized".
<b>Finalized Regulations</b>	Choose "Recently finalized regulations", or "Prior finalized regulations" (from 2002 to 2009).
<b>Status of Legislation</b>	A wealth of information regarding your State Government, including a new "Daily Session Activity by email".

## We're So Glad You Asked



*We get a lot of good questions from water system operators and officials, so we thought we'd share some of the most common questions we receive in hopes of helping more.*

### Q: Where can I find a list of certified operators who I could hire to run my water plant?

A: Go to the Pennsylvania Rural Water Association website, [www.prwa.com](http://www.prwa.com) and scroll to the bottom of the page. Click on "Contract Operators Register Here" and follow the instructions for how to narrow your search. This list does not include all Pennsylvania certified operators, only those who choose to include themselves on the list.

### Q: Can a facility use bottled water to avoid being regulated by DEP?

A: No. Per Chapter 109, a public water system provides water for "human consumption" which includes "drinking, bathing and showering, cooking, dishwashing or maintaining oral hygiene." If a facility meets the definition of a public water system in terms of service connections or population served, it cannot escape regulation by providing bottled water for drinking if the system provides water for the other normal, everyday uses listed above. For further details, see EPA Water Supply Guidance WSG 52.

**Q: My facility is only open a few days in certain calendar quarters. Why do I need to take a coliform sample?**

A: A transient water system is required to take a coliform sample any quarter in which it provides water to the public, even if they are only open a few days that quarter. For example, if a facility is open March 31 to October 1, it is required to sample in each of the four quarters. If this same facility was open April 1 to September 30, it would only need to sample in the second and third calendar quarters. Every PWS supply is required to take an annual nitrate / nitrite sample regardless of how many days it is open during the year.

**Q: The four check samples I took in response to a positive coliform sample were all negative. Can I reduce the five routine samples next month to one?**

A: No. Per Chapter §109.301(3)(ii)(F), you cannot reduce the five routine samples unless "the reason for the total coliform positive sample is determined and the problem has been corrected or will be corrected before the end of the next month." Simply having negative check samples does not automatically reduce the next month's samples. You need to find the base cause of the problem and correct it.

**Q: I've never had a bad coliform sample until now and all the checks samples were negative. Will DEP invalidate the positive sample?**

A: In most cases, the answer is "No." The only circumstances where DEP will invalidate a positive coliform sample are a) improper sample analysis by the lab; b) results of repeat samples suggest the problem is associated with a domestic or other non-distribution system plumbing problem or c) a circumstance or condition which does not reflect water quality in the distribution system such as a broken sample bottle. Per EPA guidance, the state may not invalidate a positive sample solely on the grounds that all repeat samples are negative.

**Q: I reduced the number of trailers at my mobile home park from 25 to 14. Why am I still a regulated community water system?**

A: As long as the 11 pads where the trailers sat remain, there is still a potential for 15 or more service connections. The 11 pads, including the water services, where trailers were must be removed so there is no potential to increase the number of trailers in the future. Additionally, if you have 25 or more permanent

residents, your mobile home park is still a community water system, regardless of how many service connections you have.

**Q: We aren't required to demonstrate 4-log treatment for the groundwater rule until October of 2011. Do we still have to meet the minimum free chlorine residual of 0.4 ppm at the entry point until then?**

A: Yes. Even though community water supplies (CWS) have different deadlines for demonstrating 4-log treatment and beginning compliance monitoring and reporting, all groundwater CWS's should be maintaining a minimum Entry Point free chlorine residual of at least 0.4 ppm, as of December 2009.

**Q: I've submitted the Stage 2 DBP Rule IDSE Report to DEP. When does monitoring at the new Stage 2 DBP Rule compliance locations begin?**

A: Stage 2 DBP Rule compliance monitoring is based on the system's IDSE schedule and does not begin until April 2012, at the earliest. Schedule 1 systems begin monitoring April 1, 2012; Schedule 2 systems begin monitoring October 1, 2012; and Schedule 3 systems begin monitoring April 1, 2013. Schedule 4 systems not conducting Cryptosporidium monitoring under the LT2 Rule begin Stage 2 DBP Rule compliance monitoring October 1, 2013. Schedule 4 systems that are conducting Cryptosporidium monitoring under the LT2 Rule begin Stage 2 DBP Rule compliance monitoring October 1, 2014. ALL systems need to continue to sample at their existing Stage 1 DBP Rule compliance monitoring locations until the applicable Stage 2 date.

**Q: My system did not have to complete a Stage 2 DBP Rule IDSE Report. What are the Stage 2 DBP Rule requirements for us?**

A: All systems should continue to conduct their Stage 1 DBP Rule compliance monitoring until their applicable Stage 2 DBP Rule compliance monitoring begin date (see previous answer). Additionally, systems that received a 40/30 Certification or Very Small System waiver will need to complete and submit to the Department a Stage 2 DBP Rule compliance monitoring plan prior to beginning their Stage 2 monitoring. DEP has developed a template for this monitoring plan that is available on our website at: [www.elibrary.dep.state.pa.us/dsweb/View/Collection-10727](http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-10727). Questions about the monitoring plan should be directed to the local DEP water supply inspector.