

Performance Measures of Pennsylvania's Area-Wide Optimization Program

The following report¹ contains information on the benefits, outcomes and outputs of the Filter Plant Performance Evaluation program (FPPE), Distribution System Evaluation (DSE) program, Area Wide Optimization Program (AWOP), and the Partnership for Safe Water program (Partnership).

Benefits of the Programs

The Department of Environmental Protection (DEP) has invested in programs such as FPPE, DSE, AWOP, and the Partnership to protect Pennsylvanians from waterborne diseases and, more recently, disinfection byproducts. These programs focus on filtered drinking water suppliers that obtain source water from reservoirs, lakes, rivers, streams, and groundwater sources under the direct influence of surface water (GUDI). These programs are important to Pennsylvanians and the state's surface water suppliers for the following reasons:

- ✓ **Population Impact:** Over 10.1 million people and numerous tourists receive some or all of their drinking water from the Commonwealth's public water supplies
- ✓ **Disease Prevention:** A treatment breakdown at a filter plant presents a widespread acute health threat from a waterborne disease outbreak. A disease outbreak can have a devastating impact on a community. Disease prevention saves lives and millions of dollars in expenses that businesses, homeowners, local government and state government would incur in response to an outbreak.
- ✓ **Economy and Essential Services:** The availability of safe public drinking water in sufficient quantity plays a critical role in the state's economic engine. Filter plants serve drinking water to large metropolitan areas and small rural communities and thus are a vital part of local infrastructure; they represent an essential service to factories, food processors, restaurants, and many other businesses; and they provide basic fire protection for homeowners and businesses.
- ✓ **Regulatory and Technical Complexities:** Filter plants are affected by some of the most complex regulations and involve complicated treatment processes. These programs help water suppliers in overcoming numerous on-going compliance challenges.
- ✓ **Infrastructure Improvements:** FPPE report rating and associated findings have been a long-standing consideration during the ranking process for Pennsylvania's low-interest loan program called Pennsylvania Infrastructure Investment Authority (PENNVEST).

¹ This report contains underlined website links in the areas titled, "For More Information." To access the information, you will need to view the report on a computer that is connected to the Internet.

Outcomes of the Programs

The following outcomes measure the public health benefits of the programs.

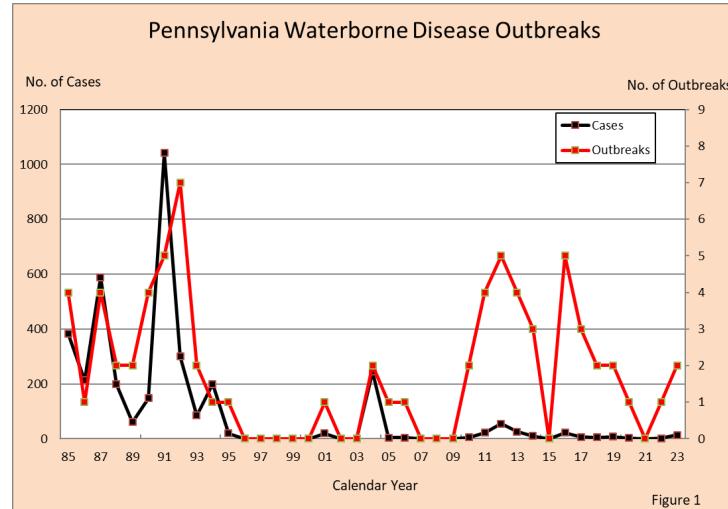


Outcome #1. Waterborne disease outbreaks associated with public drinking water in Pennsylvania.

The Pennsylvania DEP has the responsibility of assuring that the drinking water industry delivers a safe and reliable supply of water to consumers through efficiently and effectively operated facilities. Water systems that derive some or all of their drinking water from surface water sources (including GUDI) serve over 8.7 million Pennsylvanians as well as millions of visitors to the state. Pennsylvania has a tremendous interest in the potential for waterborne diseases related to public water supplies. Between 1971 and 1980, Pennsylvania reported 20 percent of all waterborne outbreaks in the United States – more than any other state in the nation. These outbreaks had widespread health implications and cost families, businesses, and local/state governments millions of dollars. Decades ago the more significant outbreaks took place among communities that were served unfiltered surface or GUDI source water. Coinciding with the adoption of Pennsylvania's mandatory surface water filtration regulation, the number of reported waterborne diseases outbreaks started to trend on a steep decline. See Figure 1. According to the Pennsylvania Department of Health, no waterborne disease outbreaks related to public drinking water supplies were reported in Pennsylvania during the period of 2007 through 2009.

Since 2010 we have noticed a new trend in reported outbreaks. CDC's outbreak reporting system known as NORS (National Outbreak Reporting System) was launched in 2009 as a web-based platform into which health departments enter outbreak information. Through NORS, CDC collects reports of enteric disease outbreaks caused by bacterial, viral, parasitic, chemical, toxin, and unknown agents, as well as waterborne outbreaks of non-enteric disease. This transition into electronic disease reporting of waterborne outbreaks took place 2009/2010. That is not to say that outbreaks of waterborne illness did not occur prior to this or were not documented, but this has certainly increased recognition and detailed reporting of waterborne outbreaks when they occur in the state. Since 2010, one (1) documented cryptosporidiosis outbreak, and thirty-three (33) documented legionella pneumophila outbreaks have occurred in the Commonwealth. Since the transition to NORS, reports of legionella pneumophila outbreaks have become a regular occurrence nearly every single year.

During 2023 there were 2 outbreaks reported that was related to public water supplies. The true number of actual outbreaks may be higher since not all outbreaks are recognized, investigated, and then reported to federal agencies. The Pennsylvania Department of Health provides DEP with current information on waterborne disease outbreaks. The sensitivity of the disease surveillance system is affected by the following factors: the size of the outbreak; severity of



disease caused by the outbreak; public awareness of the outbreak; routine laboratory testing for organisms; requirements for reporting cases of diseases; and resources available to the local health departments for surveillance and investigation of probable outbreaks. Thus, the surveillance system probably underreports the true number of outbreaks due to these factors. With the help of local public health agencies, DEP and the Pennsylvania Department of Health are continuing to improve the state's disease detection, investigation and reporting system.

Additional details regarding the 2023 public water supply outbreaks are shown below:

OUTBREAK: 1

The Pathogen/Organism: Legionella

Number of Cases: 10

Number of Hospitalizations: 2

Number of Deaths: 0

Mode of Transmission: Waterborne/Nosocomial

Underlying Deficiency: Unknown

Other Information: The facility is served by the public water supplier.

OUTBREAK: 2

The Pathogen/Organism: Legionella

Number of Cases: 3

Number of Hospitalizations: 1

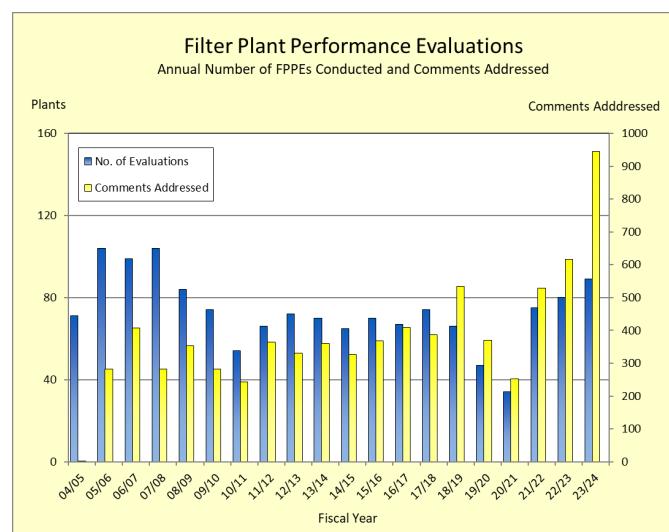
Number of Deaths: 0

Mode of Transmission: Waterborne/Nosocomial

Underlying Deficiency: Unknown, likely associated with aging infrastructure

Other Information: The facility is served by the public water supplier.

For more information: [Waterborne Disease Outbreaks in PA.](#)



Outcome #2. Follow-up efforts from 1,465 FPPEs conducted between July 1, 2004, and June 30, 2024 resulted in public water suppliers in Pennsylvania correcting 7,648 deficiencies.

The FPPE process is a method of determining the effectiveness of a filter plant in removing disease-causing organisms from the incoming raw water. Following the on-site evaluation, the water supplier receives DEP's detailed report that summarizes an assessment of plant operations, equipment and water quality conditions. The report also concludes

whether the water supplier corrected problems that DEP identified during a previous FPPE.

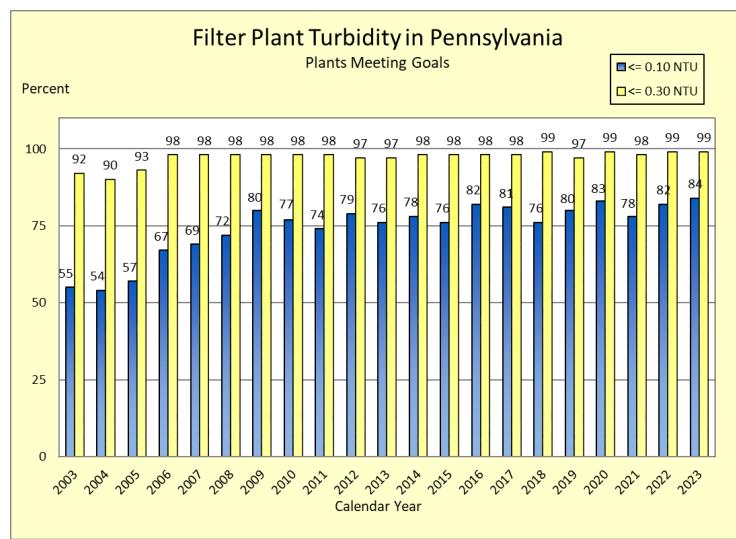
Fiscal year 2004-2005 (July 1 through June 30) is the first year when total corrections were tallied across the state. Overall, FPPEs have enhanced the skills of water supply operators and have improved drinking water quality. In fiscal year 2023-2024, operators at 87 facilities (receiving a final report with previous comments within the past 12 months) adequately addressed 945 comments from the previous FPPE reports. Over the last nineteen fiscal years, 7,648 deficiency comments were addressed at 1,465 filter plant evaluations. Since FPPE comments outline factors that are limiting optimal plant performance, adequately addressing previous comments can be considered a measure of the effectiveness of the FPPE process and a real world outcome.

For more information: [Filter Plant Performance Evaluation: Program Information](#).



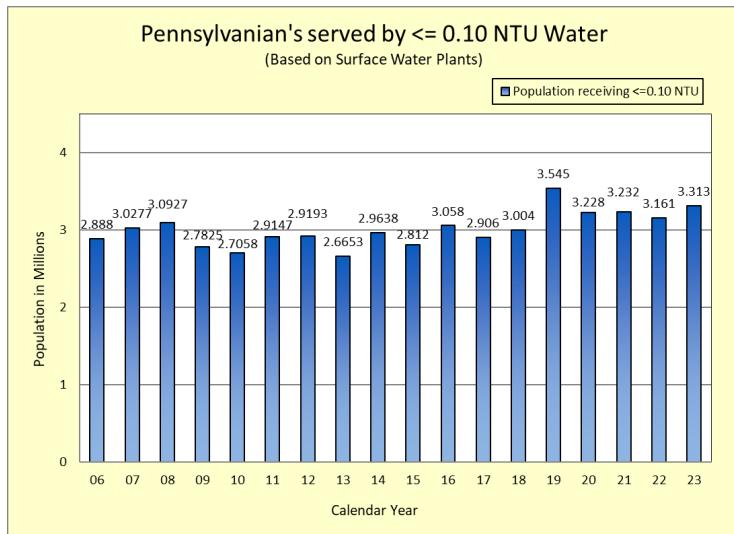
Outcome #3. In calendar years 2022 and 2023, the percentage of filter plants meeting the optimization goal of ≤ 0.10 NTU for the maximum daily combined filter effluent turbidity was 82 percent and 84 percent, respectively.

Operators at filter plants use turbidity to measure the effectiveness of the treatment processes. Turbidity is an indicator of the presence of protozoa, bacteria, viruses and other disease-causing organisms. It is measured as “NTU” or nephelometric turbidity units. Turbidity levels over 0.10 NTU represent an increased risk of a waterborne disease outbreak. DEP uses a Web-based software program called WebOAS (Web Optimization Assessment Software), which determines whether plants across the state are meeting the goals and maximizing public health protection by optimizing performance. Unlike compliance data, the optimization goal is a measure of whether water suppliers are *maximizing* public health protection by *minimizing* risks of a waterborne disease outbreak. In 2023, WebOAS data was available for 52 percent (171) of the plants in the state.



For more information: [Area Wide Optimization Program](#).





Outcome #4. Over 3.3 million Pennsylvanians are benefiting from drinking water meeting optimized turbidity performance goals. These consumers receive water from filter plants that meet the ≤ 0.10 NTU 95th percentile Optimized Performance Goal based on daily maximum combined filter effluent turbidity results. Filter plants producing water that meets the ≤ 0.10 NTU optimization goal are providing a greater level of public health protection.

The data used for this outcome came from DEP's WebOAS (Web Optimization Assessment Software), which determines whether plants across the state are meeting the goals that maximize public health protection.

Approximately 171 filter plants participated in AWOP in 2023 by submitting their turbidity data through WebOAS. Therefore, the above data/graph unfortunately does not account for the 159 plants that did not participate in AWOP in 2023.

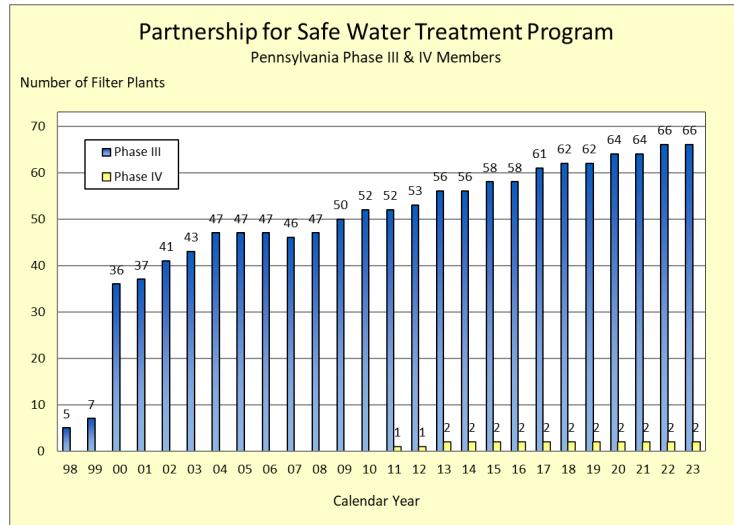
For more information: [Area Wide Optimization Program](#).



Outcome #5. Approximately 5.2 million Pennsylvanians are benefiting from improved drinking water provided from 66 filter plants that have achieved Phase III and 2 filter plants that achieved Phase IV of the Partnership program.

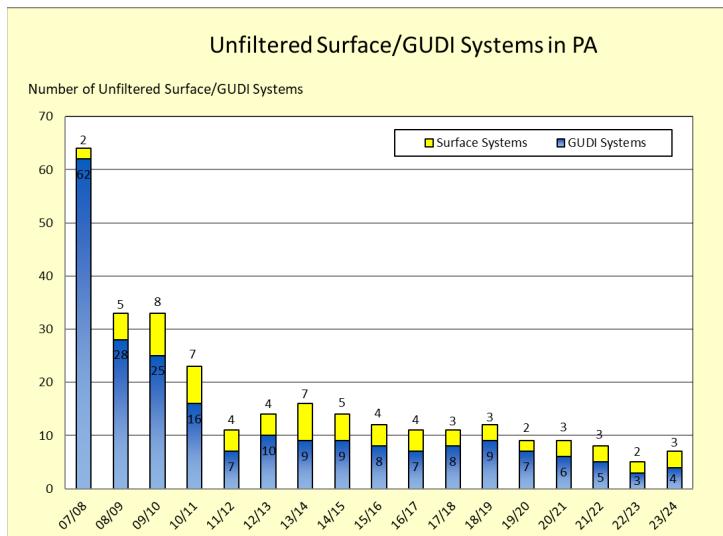
Phase III of the Partnership program is a detailed, peer-reviewed report that summarizes a rigorous self-assessment. This phase is specifically geared toward identifying weakness in plant operation, design and administration that could lead to a breakthrough of waterborne disease-causing organisms into finished water that is distributed to consumers. Based on 95th percentile turbidity values, a national Partnership report revealed that plant performance improved more than 60 percent following the Partnership Phase III self-assessment.

Phase IV is optional and includes a rigorous assessment to determine conformance with Partnership performance goals. A team of utility peers reviews the plant data and determines if optimized performance has been achieved. Successful reports will result in the plant receiving



the Excellence in Water Treatment Award from the Partnership. Currently only 19 filter plants in the nation have achieved this phase.

For more information: [Partnership for Safe Water](#).



are acceptable for drinking water systems, hence the need for filtration. Therefore, DEP is concerned about the public health risk that is created when pathogenic organisms, such as *Cryptosporidium*, are not being removed by filtration. During the last few years, the total number of unfiltered systems has remained low. In addition, the actual systems within this category may be slightly different from year to year. A few of these systems are on a compliance schedule for corrective action through Consent Order Agreements (COA).



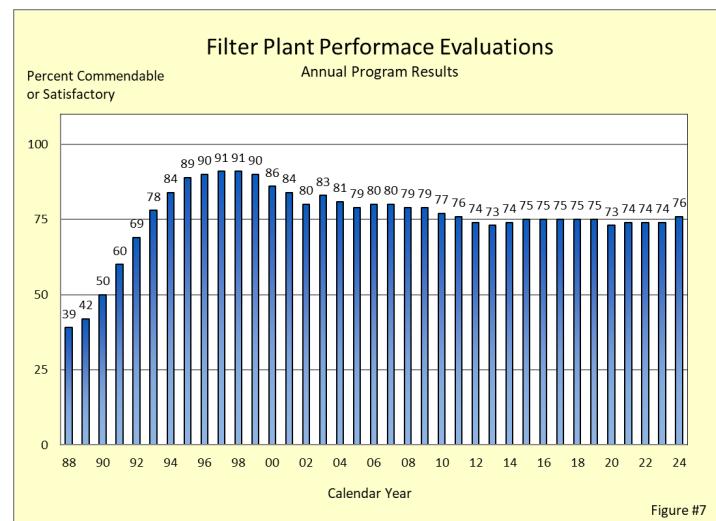
Outcome #7. Since the FPPE program's inception in 1988, the percentage of plants that were rated and have a "Commendable" or "Satisfactory" performance rating has been tracked and is currently at 76 percent.

Since 1988, over 2,575 FPPEs have occurred in the state. The drinking water industry and the FPPE protocol, have substantially evolved over this time period. Peer reviewed research indicates that a higher level of plant performance is necessary to remove pathogens. Also, the U.S. Environmental Protection Agency has promulgated more stringent

Outcome #6. The number of Surface/GUDI water systems that are using unfiltered source water has been reduced to eight.

DEP is continuously working with water systems that are using unfiltered surface and GUDI sources by having these systems either abandon their unfiltered sources, regionalize with another nearby system, or install filtration. In most cases, these water systems use disinfection as their only form of treatment. *Cryptosporidium* is resistant to levels of chlorination that

need for filtration. Therefore, DEP is



regulations at the national level. As a result, DEP's on-site FPPEs continue to become more rigorous in order to encourage water suppliers to produce filtered water quality that is better than current regulatory standards. Since the FPPE program's inception in 1988, a philosophy of maintaining a rigorous program positions Pennsylvania's filter plants for compliance with future regulations and the prevention of waterborne diseases. Therefore, when taking this into account, the accompanying graph shows that 24 percent of the plants in the state have a "Needs Improvement" performance rating.

For more information: [Filter Plant Performance Evaluation: Program Information](#).



Outputs and Status of the Programs

The following outputs measure the productivity and current status of the programs.



Output/Status #1. The current cycle to evaluate every plant in the state is once every 3.7 years. Our statewide goal and our federal grant commitment is to evaluate every plant every 3 years.

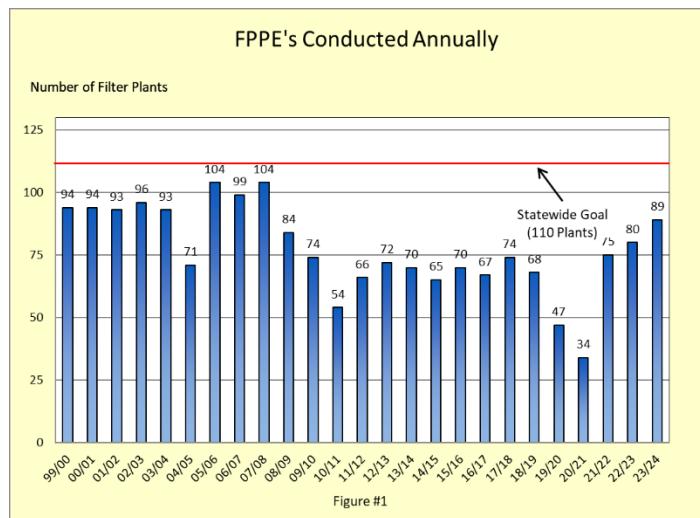
FPPEs were originally conducted by 2 staff located in central office. In July 1999, the FPPE program used EPA Setaside Funds to hire additional field operations staff, vehicles, and equipment to begin conducting evaluations at all of the state's surface water treatment plants on a more frequent basis. Eighty-nine FPPEs occurred between July 1, 2023 and June 30, 2024 equating to an Statewide FPPE return rate of every 3.7 years falling short of the every 3 year goal. In the accompanying graph, the lower bars represent more frequent FPPEs within the region.

For more information: [Filter Plant Performance Evaluation: Program Information](#).

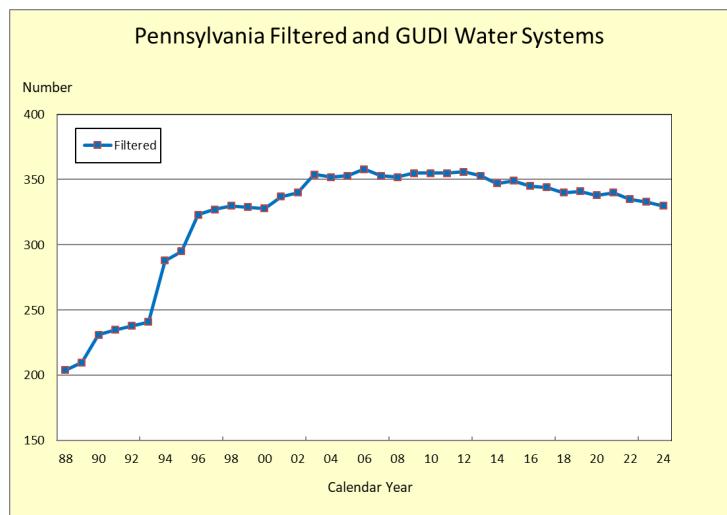


Output/Status #2. Statewide, staff have performed 89 FPPEs between July 1, 2023 and June 30, 2024.

DEP performed 1,937 evaluations from July 1999 through June 2024. Eighty-nine FPPEs occurred between July 1, 2023 and June 30, 2024. DEP's goal and federal grant commitment is to conduct an FPPE at each plant every 3 years. To meet this 3 year goal, 110 FPPEs would need to be conducted each year. In the accompanying graph, each bar represents the number of FPPEs conducted during each fiscal year (FY) since FY 99/00.



For more information: [Filter Plant Performance Evaluation: Program Information](#).



Output/Status #3. *The state's surface and GUDI water treatment plants increased from 204 (1988) to the current level of 330 plants, which together serve approximately 8.7 million Pennsylvanians and numerous out-of-state visitors.*

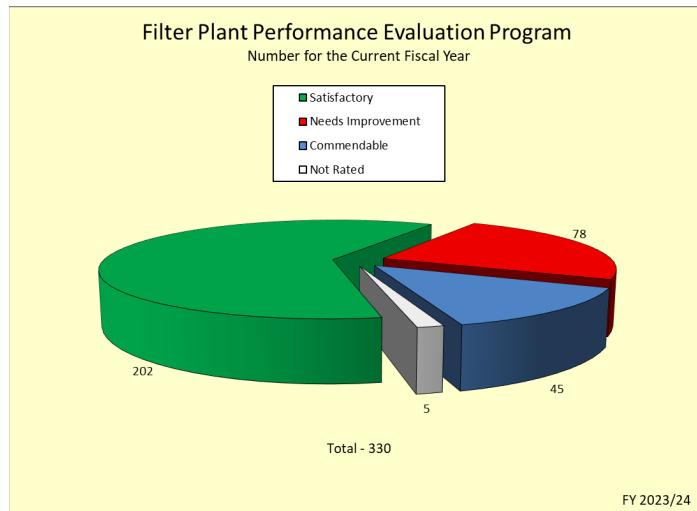
In 1989, the adoption of Pennsylvania's mandatory surface water filtration regulation resulted in a dramatic decline in risks from waterborne giardiasis and cryptosporidiosis. The number of filter plants has increased dramatically.

With filtration, our exposure to organisms resistant to disinfection, like *Cryptosporidium*, is much more limited. Today, Pennsylvania's community of surface water treatment plants provides water to over 8.7 million people. That's nearly 67 percent of the state's residents.

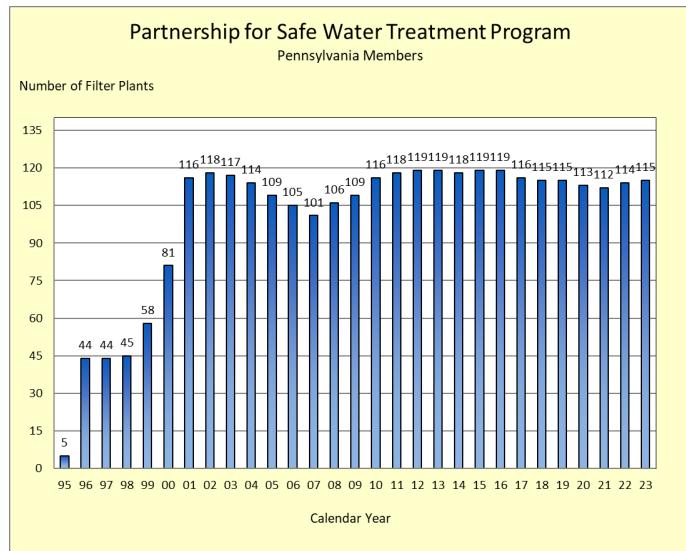


Output/Status #4. *5 filter plants are "Not Rated" and 78 plants hold a "Needs Improvement" performance rating in Pennsylvania.*

DEP will continue to work with the state's water systems that remain in the "Needs Improvement" status. The plants in this status serve over 1,048,129 Pennsylvanians. In addition, newly constructed filter plants in Pennsylvania still need a performance rating under the FPPE program.



For more information: [Filter Plant Performance Evaluation: Program Information](#).



Output/Status #5. With 115 Partnership members serving over 6.6 million customers, Pennsylvania is the leader in the nation.

The Partnership is made up of DEP, the U.S. Environmental Protection Agency, the Pennsylvania Section American Water Works Association and other drinking water organizations. Its goal is to implement preventative measures that are based on optimizing treatment plant performance. Participation shows a continuing commitment toward the goal of providing safe water 100% of the time and achieving operational excellence in for over 22 percent of the nation's total membership.

water treatment. Currently, Pennsylvania accounts for over 22 percent of the nation's total membership.

For more information: [Partnership for Safe Water: General Questions and Information](#).



Output/Status #6. Pennsylvania's Distribution System Evaluation (DSE) Program.

During implementation of the DSE program, from July 1, 2023 to June 30, 2024, DBP data evaluations were performed and several sampling projects were completed. Staff continue to annually evaluate DBP levels of all water systems in PA to prioritize which systems need assistance during the following year. Several DSE evaluations were conducted at systems that had high DBPs in the distribution system. In each case DSE staff conducted in-plant DBP and water quality sampling at the filter plants, hold studies on entry point water, and hydrant and water quality sampling in the distribution system. Storage tank assessments and the installation of portable Cl-17s on storage tanks were also done at several of the systems. Additionally, staff are planning to perform 3 full DSE this summer/fall at systems with historic DBP issues. Stephanie Stoner presented on Pennsylvania's Distribution System Evaluation program at the EPA Small Systems Workshop in September. DSE Staff also assisted in writing an article about the Distribution System Partnership for Safe Water Program and the importance of maintaining a chlorine residual with others on the PA-AWWA Distribution System committee. One vacant, DSE position was filled in April of 2024. Training the new DSE employee, limited our ability to perform evaluations and provide assistance.

For more information: [PA DEP Distribution System Optimization Webpage](#)