Minutes of the November 14, 2019 Meeting Small Water Systems Technical Assistance Center (TAC) Advisory Board

A regular meeting of the TAC Board was called to order by Chairperson Serena DiMagno at approximately 9:10 AM in Room 105 of the Rachel Carson State Office Building. The purpose of the meeting was to review and discuss pre-draft technical guidance documents.

The following Board members were present:

Amy Batdorf, Pennsylvania Municipal Authorities Association (PMAA)

Doug Crawshaw, American Water Works Association (AWWA)

Serena DiMagno, Water Works Operators Association of Pennsylvania (WWOAP)

James Steele, Pennsylvania Builders Association (PBA)

The following Alternate members were present:

Chip Bilger, Water Works Operators Association of Pennsylvania (WWOAP)

Christine Caldara Piatos, Center for Rural Pennsylvania (CRP)

Jennifer Case, Pennsylvania Municipal Authorities Association (PMAA)

Lisa Daniels, Pennsylvania Department of Environmental Protection (DEP)

Sharon Fillmann, American Water Works Association (AWWA)

Erin Gannon, Office of Consumer Advocate (OCA)

Mike Kelly, Department Community and Economic Development (DCED)

Matt Lamb, Pennsylvania Public Utility Commission (PUC)

Tesra Schlupp, Pennsylvania Infrastructure Investment Authority (PIIA)

Curt Steffy, State Board for Certification of Sewage Treatment Plant & Waterworks Operators (SBCSTPWWO)

The following Organizations were not represented:

County Commissioners Association of Pennsylvania (CCAP)

League of Women Voters, Pennsylvania

Pennsylvania Association of Conservation Districts, Inc. (PACD)

Pennsylvania Association of Realtors (PAR)

Pennsylvania Manufactured Housing Association (PMHA)

Pennsylvania Rural Water Association (PRWA)

Pennsylvania State Association of Township Supervisors (PSATS)

RCAP Solutions

Rural Utilities Service/Rural Development (RUS)

Members/alternates from 11 organizations were present; therefore, a quorum was achieved.

The following Department of Environmental Protection (DEP) staff were present:

Brad Baker, Bureau of Safe Drinking Water Amanda Ferguson, Bureau of Safe Drinking Water Mike Hess, Bureau of Safe Drinking Water David Mittner, Bureau of Safe Drinking Water Brian Chalfant, Policy Office

Chad Reisch, Bureau of Safe Drinking Water Kim Snook, Bureau of Safe Drinking Water Aaron Ward, Bureau of Safe Drinking Water Sue Weaver, Bureau of Safe Drinking Water

Non-Members present at the meeting:

Frank Medora, Aqua PA Carolyn Hathaway, Aqua PA Kodi Webb, Capital Region Water Rita Kopansky, Philadelphia Water Department Dennis O'Connor, Philadelphia Water Department Christine Swailes, Suez Matt Walborn, Western Berks Water Authority

General Advisory Board business:

Two items of general business were discussed:

- The draft minutes from the Aug 8, 2019 TAC Board meeting were presented for discussion. One edit to indicate that DEP was not represented at the meeting was noted. Jim Steele (PBA) made a motion to approve the Aug 8, 2019 minutes with the edit; Doug Crawshaw (AWWA) seconded the motion. The motion passed by a unanimous vote.
- Tentative meeting dates for 2020 were identified (Feb 25, 26 or 19; Apr 28, 29 or 30; Jul 21, 23 or 29; Nov 10, 12 or 17). DEP will confirm availability of room 105 for one date in each quarter. The meeting dates will be emailed to board members and posted in the *Pa. Bulletin* in mid-December.

SDW Updates - Unregulated Contaminants & Health Advisories

- PFAS (Per- & Polyfluoroalkyl Substances) additional details on DEP website: PFAS in PA
 - PFAS group contains ~ 6,000 chemical substances; developed in 1940's and are everywhere compounds used because of heat, grease, water & stain resistant properties; not designated as hazardous chemicals; chemicals do not degrade & are not easily removed from DW sources.
 - First identified as SDW issue during 3rd iteration of the Unregulated Contaminant Monitoring Rule (UCMR3); 175 PWSs in PA conducted sampling 2012-2015, 6 PWSs had detections (mostly in SE).
 - EPA established a combined Health Advisory (HA) level for PFOS/PFOA of 70 ng/L (ppt).
 - o PFAS now detected in 48 states in US; EPA is following their reg development process, so a federal MCL will not be set for years; individual states, including PA, are considering setting state-specific MCL.
 - 1st step is to gather additional occurrence data, so DEP has developed Sampling Plan (on DEP website); funding to collect ~ 400 samples ~40 will be "baseline" (control) samples. To date, DEP has collected about 25% of the total number of samples and 1/3 of results are Not Detected; some results have low detections, but 1 PWS has detections above the Health Advisory Level (HAL). Results will be posted to DEP PFAS website (updated quarterly).
 - Also using toxicologists to review health studies and draft cost-benefit data.
 - Any proposed regulation will be presented to TAC.
- Harmful Algal Blooms (HABs)/Cyanotoxins
 - o 2019 was active season for algal blooms (wet spring-lots of run-off followed by hot summer temps).
 - DEP is developing SOP for responding to HABs; also working to Lab Accreditation to develop process to offer accreditation for cyanotoxins; for now, PWSs must rely on labs that are EPA-approved for UCMR4.
 - EPA established a Health Advisory (HA) level for HABs, but it is right at the current detection limit.

- Multi-agency workgroup in discussions to deal with broader issues regarding recreational use concerns.
- If any PWS is doing their own sampling, DEP is requesting the local office be notified of the results.
- Legionella: Legionella are wide-spread (water in distribution systems is not sterile) but usually only become
 a problem in large buildings; Legionella concerns related to aspiration rather than ingestion. A national
 workgroup has been re-established to address issues related to Legionella in drinking water.

Discussion - TGD 1, Disinfectant Residual Reporting Instructions

- DEP explained that the changes to this document were made to include Stage 2 Disinfection Byproducts Rule, Groundwater Rule, Disinfection Requirements Rule and recent General Update regulations:
 - Separated disinfectant residuals into separate document from disinfection byproducts because intended audiences are different (PWS operators vs. accredited labs).
 - Updated contaminant and method codes; eliminated the summary reporting format.
 - o Updated examples to include Drinking Water Electronic Reporting (DWELR) system screens.
 - Updated sections on monitoring requirements.
- TAC requested clarification on:
 - o How the SOP provisions apply to a PWS with their own accredited lab.
 - Whether the "N" code can be used for weekly distribution system samples for periods when a NTNC facility (such as a school) is closed (e.g. Christmas and summer breaks).
 - o Whether MRDL compliance applies to the entry point and if so, how.
 - Whether a PWS may begin grab sampling immediately if the 1-hour notification to DEP is done to the ER line (problem occurs after hours) – PWS does not need DEP prior permission to do grab sampling.
 - The examples used for determining lowest residual of the day.

Public Comments:

Confirm whether 1-hour reporting applies to any individual distribution system measurement below
 0.15 ppm.

Discussion - TGD 2, Public Water Supply Manual, Part II - Community System Design Standards

- DEP reminded TAC that all portions of this document have been significantly revised because it was last updated in 2006. Revisions were needed to incorporate new treatment technologies (including new details on chloramines, UV, membrane filtration, bag/cartridge filters, ion exchange, nanofiltration/RO and arsenic) and to conform to DEP regulations, current AWWA standards and the 2018 10-States' standards. Additional details are included for Simultaneous Compliance documentation.
- TAC requested clarification on: the 0.3 mg/L HA level for manganese and ion exchange treatment (4.7.5); the
 disinfectant requirement for stock phosphate (4.7.6.2); why the minimum pressure provided from finished
 water storage was increased to 35 psig (7.3.2); and why multiple smaller inlets should not be used for
 passive mixing (7.3.5).

• TAC also requested that they be allowed to submit written comments for consideration; DEP agreed and requested comments be submitted to Mike Hess.

Discussion - TGD 3, Public Water Supply Manual, Part IV - Noncommunity System Design Standards

- DEP first presented a general outline to TAC at the Jan 2019 meeting. This is the pre-draft guidance document. As with Part II, nearly all portions of this document have been significantly revised because it was last updated in 2001. Revisions were needed to incorporate new treatment technologies and to conform to DEP regulations, current AWWA standards and the 2018 10-States' standards.
- TAC requested TAC requested clarification on requirements for NSF Standard 55 "Class A" disinfection systems (3.2.2) and the 0.3 mg/L HA level for manganese and ion exchange treatment (3.5.4).

Adjourn

A motion was made to adjourn. The motion passed by a unanimous vote.