Minutes of the May 26, 2015 Meeting
Small Water Systems Technical Assistance Center (TAC)
Advisory Board

A regular meeting of the TAC Board was called to order by Tom Fridirici, Department liaison to the Board at approximately 9:00 AM in Susquehanna Conference Rooms A&B in the Southcentral Regional office of DEP. Chairperson Serena A. DiMagno was in attendance and assumed responsibility for the meeting immediately after the opening remarks and housekeeping. The purpose of the meeting was to gather stakeholder input specific to the distribution disinfection residual requirements in the proposed Revised Total Coliform Rule (RTCR). This was the fourth meeting of the Board in 2015.

The following Board members were present:

Penny McCoy, Pennsylvania Rural Water Association
Serena DiMagno, Water Works Operators Association of Pennsylvania
Mary Roland, State Board for Certification of Sewage Treatment Plant and Waterworks Operators
Stan Brown, Pennsylvania Public Utilities Commission
Tom Essig, RCAP Solutions

The following Alternate members were present:

Lisa Daniels, Pennsylvania Department of Environmental Protection
Jennifer Case, Pennsylvania Municipal Authorities Association
Mike McFadden, American Water Works Association
Chip Bilger, Water Works Operators Association of Pennsylvania
Mary Gaiski, Pennsylvania Manufactured Housing Association
James Wheeler, Pennsylvania State Association of Township Supervisors
James Steele, Pennsylvania Home Builders Association
Robert H. Boos, Pennsylvania Infrastructure Investment Authority
Christine Caldara Piatos, Center for Rural Pennsylvania
Sukhwindar Singh, RCAP Solutions, Inc.
Erin Gannon, Office of Consumer Advocate

The following organizations were not represented:

County Commissioners Association of Pennsylvania
Pennsylvania Association of Realtors
League of Women Voters, Pennsylvania
Pennsylvania Association of Conservation Districts, Inc.
Pennsylvania Department of Community and Economic Affairs
Rural Utilities Service/Rural Development

The following DEP staff were present:

Tom Fridirici, Bureau of Safe Drinking Water
Dawn Hissner, Bureau of Safe Drinking Water
Jeff Allgyer, Bureau of Safe Drinking Water
Sabrina Haydt, Bureau of Safe Drinking Water

Joanne Nardone, Bureau of Safe Drinking Water
Wendy Lloyd, Bureau of Safe Drinking Water
Bill McNamara, Bureau of Safe Drinking Water
Deb Rotz, Bureau of Safe Drinking Water
Kurt Smith, Bureau of Safe Drinking Water
Justin Blashaw, Bureau of Safe Drinking Water
Hayley Jeffords, DEP Policy Office
Rod Nesmith, SCRO/SDW
Justin Hofstetter, SCRO/SDW
Ed Chescattie, SCRO/SDW

Non-Members present at the meeting:

Colleen Arnold, Aqua Pennsylvania
Frank Medora, Aqua Pennsylvania
Charles Hertz, Aqua America
Steve Tagert, Aqua America
Shannon Williams, Capital Region Water
Sharon Fillmann, Chester Water Authority
Anita Martin, Chester Water Authority
David Lewis, Columbia water Company
Pat Mandes, Lehigh County Authority
Donna Wingle, Lehigh County Authority
Aurel Arndt, Lehigh County Authority
Tony Bellitto, North Penn Water Authority
Dan Preston, North Penn Water Authority (via webinar)
Tom Bradbury, North Wales Water Authority
Paul Zielinski, Pennsylvania American Water Company
Kate Guest, Philadelphia Water Department
Rita Kopanski, Philadelphia Water Department
Kelly Anderson, Philadelphia Water Department
Alison Aminto, Philadelphia Water Department
Gary Burlingame, Philadelphia Water Department
Dennis O'Connor, Philadelphia Water Department
John Muldowney, Philadelphia Water Department
Chris Swailes, United Water
Mary Neutz, United Water
John Hollenbach, United Water Pennsylvania
Matt Walborn, Western Berks Water Authority
Douglas Crawshaw, The York Water Company
Jennifer Clancy, Corona Environmental Consulting
Jeff Rosen, Corona Environmental Consulting
Tim Bartriend, Corona Environmental Consulting

General Advisory Board business:

Two items of general business were introduced prior to new business:

- Minutes from the May 18th, 2015 TAC board meeting area still being written and will be posted as draft once finalized.
- Three organizations have failed to send a representative to at least three of the last four meetings. Those organizations are PA Association of Realtors, Center for Rural Pennsylvania and Rural Utilities/Rural Development. Robert Boos made a motion to send status letters to those organizations; Mary Roland seconded the motion, motion carried by voice vote.

Presentation from Stakeholders and Public Water systems:

NOTE: The Power Point slides associated with the following presentations are available on the TAC Board website.

The RTCR and Chlorine Residual Standard and Its Operational Impacts on Lehigh County Authority Water Systems - Aurel Arndt, Lehigh County Authority

Questions from TAC Board:

- Lisa asked if the issue was the chlorine residual or the need for PN. (A: there is no EPA mandate to increase the chlorine residual or to define the residual as a fixed number.)
- Mary Roland asked what was the number one customer complaint? (A: T&O tied to chlorine, they object to what protects them the most.)

Area-Wide Optimization Program's (AWOP) Approach to Maintaining Distribution System Water Quality – Alison Dugan and Matt Alexander, EPA OGWDW Distribution System Optimization Program

TAC Board questions:

- Mary Roland – Q: was a dechlorinating agent used during flushing? (A: no, not near streams); when water was described as "not good" was that as measured by coliform or HPC? (A: chlorine residual only.)
- Mike McFadden – Q: where is the 0.2 mg/L measured? (A: as close to the main as possible, not consumers' homes.)
- Chip Bilger – how many PA systems participate in the Optimization program and how many meet goals? (A: Kevin Anderson from BSDW – we review about 6 plants per year. **Update:** 13 systems have been evaluated – 11 using free chlorine and 2 using chloramines. For the 11 free chlorine systems, the following percentage of samples met the goal of 0.2 mg/L: range = 18% - 100%, mean = 58%, and median = 69%. For the 2 chloramine systems, the percentage of samples that met the goal of 0.2 mg/L was 62% and 94%. Finally, these systems participated in an evaluation in response to DBP violations. These systems were not necessarily pursuing optimized performance at the time that this data was collected**.**)

Western Berks Water Authority – Matthew Walborn, Western Berks Water Authority

TAC Board questions:

- Lisa – what changes would be needed in WBWA operations to meet proposed regulations, consecutives might need to boost chlorine or change their operations? (A: WBWA would need as yet unknown changes in operations, water providers would do what needs to be done.)

Impact of the Proposed Chapter 109 Update to Disinfectant Residual Requirements – Mary Neutz, United Water

TAC Board comments;

- Lisa – Q: does United use flushing to control free chlorine in the "D" system? (A: yes) United's CCR shows it could meet 0.2 or 0.3 mg/L. (A: CCR is an average value).

Implementing the RTCR – Jeff Rosen, Corona Environmental Consulting

Board questions:

- Stan Brown – Q: is there a list of the companies that Corona represents? (A: Aqua, York Water Company, Pittsburgh, North Penn, North Wales, United, etc.)

Pennsylvania's Proposed Disinfectant Residual Requirements and Supporting Data – Lisa Daniels, DEP

Board comments:

- Penny McCoy asked is the requirement to sample once per month is based on 3,300 population (A: no, based on TCR which cuts off one sample at 1000 population served).
- Serena Dimagno made the comments that this information is new, too short notice to understand (A: today's presentations are information only; DEP is not asking for a vote or final recommendations at this time. Final comments will be solicited at the June 30th meeting.)
- Mary – Q: how long have we been studying the 0.02 mg/L issue; has the Colorado study been repeated? (A: info on interference has been known for a long time; DEP has been discussing Mn interferences with staff for about 6 months.)

After the lunch break

Microbiological Water Quality in the Distribution System and Premise Plumbing: Legionnaires' Disease – Jennifer Clancy, Corona Environmental Consulting

TAC Board comments:

- Mary – Q: no amount of chlorine will prevent Legionella in premise plumbing (A: yes).
- Lisa made the comments that distribution vs. premise plumbing, the lines are blurred in that with most noncommunity water systems (and some non-traditional CWSs), the distribution system is the premise plumbing.
- Jennifer Case – comment: AWWA/Water Utilities Council & EPA are looking at Legionella in the 6 year review process.
- Jeff Rosen (non- Board member) – comment: chlorine residual might not make any difference in Legionella control.

The RTCR and Chlorine Residual Standard and its Operational Impacts on the Utility – Gary Burlingame, Philadelphia Water Department

Board comments:

- Lisa – Q: would the impact to the system be the same at 0.2 vs. 0.3 or 0.5 mg/L? (A: don't have that answer, need other PWD personnel to provide that.) If we agree that 0.02mg/L is un-protective of public health do you have any opinion on the right number? (A: no)

Impact of Pre-Draft Chapter 109 Revisions: The Impacts are Complex and Require Proper Vetting – David Lewis, Columbia Water Company

TAC Board comments;

- Mary – Q: what is the number one customer complaint? (A: T&O related to chlorine)

Chlorine Residual and Compliance Samples in Distribution Systems – Charles Hertz, Aqua PA

- Lisa – Aqua's CCR suggest 0.2 isn't much of a problem (A: 0.2 mg/L will have a bigger impact in the SE parts of our system and in the chloraminated systems).
- Mike – most systems will have trouble with the proposed requirements; Aqua's position (A: PN will be the biggest problem)

Chairperson DiMagno asked for open conversation:

- Tony Bellitto – comments: we need to consider the impact of PN based on proposed standards, systems would need to adjust, to ramp up to new standards...when they get customer complaints they will refer them to DEP for response… (Lisa suggested there could be an implementation rollout to avoid the shock effect of the new standards.)
- Gary Burlingame – comments: there are two main issues; customers will use POU devices, whole house carbon filter for example to remove the chlorine. System will need to control nitrification to manage chlorine issues; will there be a guidance manual for how to develop a nitrification plan? (Lisa: we'll reference existing industry standards.)
- Steve Tagert – Aqua would have trouble at 0.20 mg/L because 0.19 mg/L would mean need to issue PN; too many PNs and they start to not make any sense. Anything that effects storage effects fire protection, in turn...PWS have liability as a private company so flushing is not as uncomplicated as it sounds. Keep minimum disinfection at federal level. (A: Lisa – DEP will research the federal PN requirements.) **Update on 6/15/2015:** EPA Region III confirmed that PN is required when the federal standard is violated (non-detectable in more than 5% of samples in two consecutive months). The federal rule does not allow any additional time for corrective actions. Tier 2 PN must be issued.
- TAC Board – are we going to have a revised Annex A to review? (A: yes, sent to everyone before June 16th TAC Board meeting.)
- Chip – how can we review a new Annex A before we know what the PN requirement will be? Serena agreed that we appear to be barreling forward without having the package finalized.
- Sharon Fillmann – why are the rules constantly changing? The industry isn't ready for the regulation changes; the constant changing means that the TAC Board is constantly confused about what is being proposed.
- Lisa – there will be a formal presentation of Annex A revisions at the June 16th TAC Board meeting.
- Chip – Board members will not have time to review and get comments from their constituents and be ready to vote on the 16th.

- Lisa – the changes to the proposed regulations are in response to comments by Board members. DEP is being responsive to the Board's concern. We will determine if June 30th is too late in the schedule to take a final vote.
- Mary asked that DEP send the timeline of regulation package deadlines; the Board needs clarification on log inactivation requirements.

No further discussion. Mary Roland made a motion to adjourn, Stan Brown seconded, motion carried and the meeting ended at 3:30 pm.