Minutes of the May 18, 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 third meeting of the Board in 2015.

The following Board members were present:

Penny McCoy, Pennsylvania Rural Water Association
Lee Koch, Pennsylvania Municipal Authorities Association
Serena DiMagno, Water Works Operators Association of Pennsylvania
Mike Sienkiewicz, Pennsylvania Manufactured Housing Association
Mary Roland, State Board for Certification of Sewage Treatment Plant and Waterworks Operators
Stan Brown, Pennsylvania Public Utilities Commission
Christine Hoover, Office of Consumer Advocate

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
Curt Steffy, State Board for Certification of Sewage Treatment Plant and Waterworks Operators
Sukhwindar Singh, RCAP Solutions, Inc.
Ashley Everette, 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
Center for Rural Pennsylvania
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
Rod Nesmith, SCRO/SDW
Lynne Scheetz, SCRO/SDW
Ann Johnston, SCRO/Regional Counsel
Hayley Jeffords, DEP Policy Office
Bill Cumings, Program Counsel

Non-Members present at the meeting:

Sharon Fillmann, Chester Water Authority
Anita Martin, Chester Water Authority
Donna Wingle, Lehigh County Authority
Douglas Crawshaw, The York Water Company
Chris Swailes, United Water
Mary Neutz, United Water
Heidi Palmer, North Penn Water Authority
Frank Medora, Aqua Pennsylvania
Charles Hertz, Aqua America
Matt Walborn, Western Berks Water Authority
Alison Aminto, Philadelphia Water Department
Dan Preston, North Penn Water Authority
Jennifer Clancy, Corona Environmental
Tony Bellitto, North Penn Water Authority

Paul Zielinski, Pennsylvania American Water Company
David Lewis, Columbia water Company
Christina Kistler, M.J. Reider Associates
Mark LeChevallier, American Water
Shannon Williams, Capital Region Water
Larry Miller, Miller & Sons
Colleen Arnold, Aqua Pennsylvania
Jeff Hines, The York Water Company
Kate Guest, Philadelphia Water Department

General Advisory Board business:

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

- Minutes from the April 30, 2015 TAC board meeting were circulated, motion to ratify by Mary Giaski, 2nd by Jim Steele, motion carried by unanimous voice vote, with one edit – addition of DBP concern resulting from higher distribution residual in other states (Chairperson DiMagno). Minutes will be posted on the public access web site.
- Resignation of Julie Kollar from Pa League of Women Voters. Notified via email; the organization will consider nominating an alternate representative.
- Chairperson DiMagno signed a letter to Pennsylvania Association of Conservation Districts regarding their lack of attendance at TAC Board meetings.

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

Summary of the Pre-Draft Proposed Rulemaking for Revised Disinfectant Residual:

Lisa Daniels provided a summary of proposed disinfectant residual requirements. The PPP outlined the existing requirements and proposed changes. The PPP included a list of reference material. Lisa reviewed waterborne disease statistics, discussed emerging pathogens and discussed disinfection standards in other states.

Mary Roland:

- Q: Did the waterborne disease outbreaks originate from Coliform contamination. (A: mostly Legionella)
- Q: What was the chlorine residual in the systems with waterborne disease outbreaks? (A; difficult to determine due to who investigates these outbreaks, DoH vs. DEP)

- Q: Was one of the incidents the VA hospital in Pittsburgh (yes) and if so the hospital says that the on-site Legionella control treatment was not functioning at the time of the outbreak...what was the residual in the distribution system at the time of the outbreak? (A: UNKN)
- Q: The Department promised to provide numbers of potential Level 1 and Level 2 Assessments based on historical data. (A: DEP will provide those numbers at the next meeting or during the June 16th meeting)
- Suggested just enforcing the current regulation in order to have fewer compliance issues.

Chris Hoover: Q: Do we have information about contact time at systems. (A: 20 minutes minimal required by design standards, specific information found in permits)

Sukh Singh: Q: who is responsible for calibration of the field meters? (A: QA/QC of field meters is a requirement, Department can require certified lab to take sample if equipment is not calibrated correctly).

Annex A update:

Dawn Hissner, of DEP's Bureau of Safe Drinking Water presented a PowerPoint outline of the disinfection requirement parts of the divided regulatory package.

Mary Roland: Q: Is five working days more stringent than the Federal requirement. (A: change made to 5 "working" days in response to TAC Board comments).
The Board had a number of comments relating to the proposed requirement to calculate and report CT values:

- Does the requirement to calculate and report CT values mean that it must be done automatically?
- How often must CT be calculated, once per day, every shift, every four hours, continuously?
- Staff from SCRO mentioned that four high profile filter plants recently inspected were found to not have met 1-log CT requirements.
- Is the reporting of CT values necessary to maintain primacy and if not, why is it included in the proposed package?

Board agreed to follow up on this topic at the June meeting.

Mary Roland: Q: why is the HPC requirement being dropped? EPA stresses how important HPC is for assessment of sanitary defects. (A: proposal is to drop the requirement when residual is not detected, PWS can still take HPC samples).

Presentation from Stakeholders including Public Water systems and the Center for Disease Control (CDC):

An External Viewpoint on the Proposed Changes to the DEP Regulations on Mandatory Chlorine Residuals in a Distribution System and How These Impact Legionella Issues – Dr. Mark LeChevallier &, Paul Zielinski, Pa American

Mike Sienkiewicz: concluded that if water systems just followed the existing rules this issue would be "much ado about nothing". Paul responded that 0.02 mg/L isn't a valid number.

Pre-Draft Chapter 109 Revisions: One Water Utility's Perspective – Dan Preston/Heidi Palmer, North Penn Water Authority

After the lunch break:

Legionella and Public Health – Natalia A. Kozak-Muiznieks, PhD

Chapter 109 Update, Water Supplier Challenges and Unintended Consequences – Jeff Hines, The York Water Company

Lisa asked if 0.1 mg/L is a true residual, (Jeff, yes, no coliform or HPC).
Lisa asked about the flushing program currently in place at York Water, (annual flushing, ½ of our 200 hydrants, some focus on red water issues).
Lisa asked how many samples are taken each month, (required to take 120 but typically take more, especially at tanks. York samples at 70 – 80 different sites).
An audience member asked if York boosts chlorine or chloramines, (currently free chlorine boosters, no adverse effects because there is excess ammonia in the system which then reforms chloramines.

RTCR and Chlorine Residuals – Overall Look From A Utility Perspective – Sharon Fillmann, Chester Water Authority

There were a number of questions from TAC Board members:
What happened to the 4 hour time frame for responding to low residuals, (we heard the Board that 4 hours is not enough time to make a change in the D system. We would consider allowing 24 hours to correct the problem. Also, if 100% is not possible would 95% compliance be reasonable? The violation would occur when the problem was not corrected, not when originally observed.)
How many times have PWS violated the 0.02 mg/L requirement, (we don't have those numbers but can have them for the June meeting).
If 0.02 mg/L is a problem where are the T/F positive coliform samples in Pennsylvania?

TAC Board Discussion:

Mike Sienkiewicz: there have been some great speakers, yet, it appears that we are trying to justify what is on the paper (proposed revisions). Why don't we just throw out the proposal and put together something that is good.
Chip Bilger asked what the process will be to resolve the issue. (rationale for residual number will come out in the preamble to the proposed regulation).
Serena DiMagno: Q: why do other states still use 0.02 mg/L? How do states that have a higher residual implement compliance? What does increased residual mean for DBP compliance in those other states?
Mary Roland: Q: are there TCR violations at Chester Water Authority? (A: No). Who follows up on Legionella outbreaks in buildings? (A: shared responsibility, PWS must insure quality of water at the meter pit).
Mark LeChevallier: Q: how many violations have occurred in states with higher residuals? (A: cannot be determined because the TT is for both lack of a residual and residual at the Entry Point).
Chip Bilger: Q: could we get Hach to come in to explain why 0.02 was originally considered a detectable residual?

Chairperson DiMagno asked for public comments:

Christina Kistler, M.J. Reider Associates asked what the labs responsibility is when the lab tech finds no chlorine when sampling? (A: call the certified operator for the system).
Paul Zielinski asked if a compromise could be achieved between keeping disinfection separate from RTCR and the DEP's need for a chlorine number. (A: public health protection requires a number that can be implemented, DEP does not want to wait another year to get consensus.)
Chuck Hertz mentioned that he has about 11 years' worth of data that he will share on the 26th, very few positive samples and positive samples have no relationship with measured chlorine residual.

No further discussion. Lee Koch made a motion to adjourn, Jim Steele seconded, motion carried and the meeting ended at 3:19 pm.