

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Safe Drinking Water

DOCUMENT NUMBER: 393-2129-003

TITLE: Policy for Determining When Loss of Positive Pressure Situations in the Distribution System Require One-Hour Reporting to the Department and Issuing Tier 1 Public Notification

EFFECTIVE DATE: April 2, 2022

AUTHORITY: Pennsylvania's Safe Drinking Water Act (35 P.S. § 721.1 *et seq.*) and regulations at 25 Pa. Code Chapter 109

POLICY: Public water suppliers and Department of Environmental Protection (Department or DEP) staff should follow the guidance and procedures presented in this document to respond to loss of positive pressure situations in the distribution system.

PURPOSE: The purpose of this guidance document is to provide a uniform protocol for public water systems when responding to loss of positive pressure situations in the distribution system to ensure the protection of public health.

APPLICABILITY: This guidance will apply to all public water systems.

DISCLAIMER: The policies and procedures outlined in this guidance are intended to supplement existing requirements. Nothing in the policies or procedures shall affect regulatory requirements.

The policies and procedures herein are not an adjudication or a regulation. DEP does not intend to give this guidance that weight or deference. This document establishes the framework, within which DEP will exercise its administrative discretion in the future. DEP reserves the discretion to deviate from this policy statement if circumstances warrant.

PAGE LENGTH: 10 pages

DEFINITIONS: See 25 Pa. Code Chapter 109

POLICY FOR DETERMINING WHEN LOSS OF POSITIVE PRESSURE SITUATIONS IN THE DISTRIBUTION SYSTEM REQUIRE ONE-HOUR REPORTING TO THE DEPARTMENT AND ISSUING TIER 1 PUBLIC NOTIFICATION

I. PURPOSE

This policy document is intended to provide a uniform protocol for public water suppliers and Department of Environmental Protection (Department or DEP) staff to use in evaluating and responding to possible contamination of water distribution systems during loss of positive pressure situations caused by a physical disruption (i.e., line breaks, valve repairs, new construction, etc.) or an operational disruption (i.e., pump failure, power outage, telemetry failure, extreme fire flows, source outage, depletion of storage, etc.). This policy provides uniform procedures to ensure water supplies are safe for potable use during a loss of positive pressure situation and after pressure is restored.

II. BACKGROUND

Any disruption of a water distribution system that results in a loss of positive pressure may allow contaminants to enter the distribution system. Water suppliers can minimize contamination by implementing acceptable DEP and water industry standards and practices. Pursuant to DEP's safe drinking water regulations at 25 Pa. Code [Chapter 109](#) and DEP's *Public Water Supply Manual – Part II (383-2125-108)*, water suppliers shall adhere to the most recent edition of the American Water Works Association (AWWA) Standard C-651, Disinfecting Water Mains, when repairing or replacing water mains to ensure that water quality is not compromised or degraded. Standard C-651 includes procedures for adequate flushing, disinfection, and microbiological testing. Refer to Section V of this policy for more information about Standard C-651.

In certain situations, additional measures may be necessary in order to protect public health. This guidance document will discuss when one-hour reporting to DEP and issuance of Tier 1 public notification (PN) may be warranted.

III. APPLICABLE REGULATIONS

The following sections of DEP's safe drinking water regulations at 25 Pa. Code Chapter 109 are relevant to this policy:

- A. § 109.4.** Requirement to effectively operate and maintain public water system facilities and to take whatever investigative or corrective action is necessary to assure that safe and potable water is continuously supplied to users.
- B. § 109.408.** Tier 1 public notice.
- C. § 109.602(a)-(c).** Acceptable design.
- D. § 109.606.** Chemicals, materials and equipment.
- E. § 109.607.** Pressures.
- F. § 109.701(a)(3).** One-hour reporting requirements.

- G. § 109.702. Operation and maintenance plan. (a) A community water supplier shall develop an operation and maintenance plan for the community water system. The operation and maintenance plan must generally conform to the guidelines contained in the Department's *Public Water Supply Manual* and contain at least the following information: ... (3) Procedures for repairing and replacing water mains that conform to the Department and water industry standards.
- H. § 109.709. Cross-connection control program.
- I. § 109.710. Disinfectant residual in the distribution system.
- J. § 109.711. Disinfection of facilities prior to placing them into service. ... (b) After repairing a facility or performing other activities which place the facility out of service, and before returning the facility to service, the public water supplier shall disinfect the facilities in accordance with the most recent procedures established by the American Water Works Association.

IV. OTHER APPLICABLE REFERENCES

- A. DEP's *Public Water Supply Manual – Part II: Community System Design Standards* ([383-2125-108](#)).
- B. DEP's *Policy for Issuing and Removing Water Supply Warnings* ([383-2129-005](#)).
- C. Latest standards issued by the American Water Works Association (AWWA) and the American National Standards Institute (ANSI), including the most recent edition of ANSI/AWWA Standard C651 - Disinfecting Water Mains.

AWWA Standards are copyrighted materials. To place an order, please call AWWA Customer Service at 800-926-7337.

Individual AWWA Standards may also be ordered online from AWWA's website at www.awwa.org.

- D. *Disinfection of Pipelines and Storage Facilities Field Guide*, AWWA, 2006.
- E. *Recommended Standards for Water Works*, Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, most recent edition. These Standards are otherwise known as 10 State Standards.

V. POLICY

A. One-Hour Reporting Requirements for Loss of Positive Pressure Situations

Under § 109.701(a)(3)(iii), a public water supplier shall report the circumstances to the Department within one (1) hour of discovery when circumstances exist which may adversely affect the quantity or quality of drinking water including, but not limited to, a situation that causes a loss of positive water pressure in any portion of the distribution

system where there is evidence of contamination or a water supplier suspects a high risk of contamination.

To clarify this requirement, **a water supplier shall notify DEP within one (1) hour if any of the following circumstances occur:**

1. A loss of positive pressure within the distribution system is caused by a situation other than a main break, including (but not limited to) a power outage, pump failure, source outage, or depletion of storage. Situations such as these are likely to result in widespread impacts, increasing the likelihood of potential pathways for contamination, and making it extremely difficult to fully and effectively evaluate the situation to rule out the risk of contamination within all affected portions of the distribution system.
2. A loss of positive pressure within the distribution system is caused by a main break, repair, or replacement **and** there is either:
 - Evidence of contamination **or**
 - A high risk of contamination.

Each main break, repair, or replacement needs to be evaluated on a case-by-case basis to determine whether there is evidence or a high risk of contamination. These evaluations are considered process control decisions as defined in 25 Pa. Code [Chapter 302](#) (relating to administration of the water and wastewater systems operators' certification program). Section 302.104(a) requires process control decisions to be made by an appropriately certified operator, and Section 302.901(a)(5) identifies Class E as the appropriate classification for water distribution systems.

Therefore, it is critical to note that a Class E Distribution certified operator needs to be on site if possible, or at a minimum, be available for consultation by phone with someone who is on site and can clearly convey observations in order to evaluate each situation. **If a Class E certified operator is not available to evaluate the risk of contamination, the situation is considered to be a high risk for contamination and the one-hour reporting requirement applies.**

Some examples of evidence of contamination within the distribution system include, but are not limited to:

- Changes to the physical characteristics of the water, such as unusual discoloration, taste or odor, or increased temperature due to backflow from a hot water heater.
- Changes to the water chemistry as evidenced by field test results.

Some examples of situations with a high risk of contamination include, but are not limited to:

- A flooded trench that cannot be properly dewatered or remedied by best management practices where the water level is at or above the level of the pipe being repaired.
- Evidence of contamination of nearby soils from leaking sewer lines near the site of the main break.
- Evidence of contamination of nearby soils from failing on-lot septic systems near the site of the main break.
- Evidence of contamination caused by back flow or a cross connection entering the distribution system in the area of the main break or other impacted area.
- High system unaccounted for water loss (i.e., > 20%) due to leaks in the distribution system.
- Low system water storage as a result of a main break, which causes loss of service to customers, including any customers located outside of the immediate area surrounding the break, such as those located in lower pressure zones or a higher elevation.
- Evidence of contamination caused by a stream or river crossing.
- Any condition that allows contaminated water to enter the distribution system.

Section 109.701(a)(3)(iii) provides that if there is loss of positive pressure in “any portion of the distribution system,” the one-hour reporting requirement may apply. During a repair completed while maintaining positive pressure in the immediate area, other portions of the distribution system, including higher elevations or other lower pressure zones, may be vulnerable to a loss of pressure. The Class E certified operator evaluating the situation should consider the need to monitor pressure in areas of the system outside the immediate area surrounding the break. **If any portion of the distribution system experiences a loss of positive pressure, a potential public health threat may exist; therefore, that portion of the system needs to be evaluated to determine if the one-hour reporting requirement applies.**

3. Repairs to a main break associated with a loss of positive pressure cannot be completed as per the requirements under ANSI/AWWA Standard C-651 and this policy. Section 109.711 requires public water suppliers to follow the most recent procedures established by AWWA for disinfection of facilities before returning the facility to service after repair. Therefore, all public water suppliers should have access to a copy of the standard; at a minimum, they should ensure that their

staff and/or contractors conducting repairs have access to **and** are following Standard C-651 for any main break repairs.

4. Special bacteriological samples collected as per ANSI/AWWA Standard C-651 and this policy are positive for *E. coli*.

It is important to note that distribution pressures should be monitored using all available data, and the need for one-hour reporting should be routinely reevaluated, throughout any situation with the potential for loss of pressure in the distribution system. For example, a main break may be repaired under reduced operating pressure, but if the operator determines that positive pressure has been lost in any portion of the distribution system during the repair, that portion of the system needs to be evaluated to determine whether the one-hour reporting requirement applies. If so, the time clock for one-hour reporting would begin upon that determination.

B. Tier 1 PN Requirements for Loss of Positive Pressure Situations

For any of the situations listed above, a water supplier shall also consult with DEP regarding the need for and issuance of Tier 1 PN in the form of a Boil Water Advisory (BWA) or some other water supply warning, as provided in 25 Pa. Code § 109.408(b)(3). Tier 1 PN will generally be required for situations meeting the criteria in Section V.A.2, Section V.A.3, or Section V.A.4 of this policy. Situations meeting the criteria in Section V.A.1 of this policy may require a Tier 1 PN.

Refer to DEP's *Policy for Issuing and Removing Water Supply Warnings* ([383-2129-005](#)) for more information about PN and additional follow-up actions. For example, additional follow-up actions for a BWA may include: repairing/replacing water lines, establishing and maintaining higher chlorine residuals, flushing lines, collecting check samples, etc.

C. Best Management Practices for Main Breaks Which Result in a Loss of Positive Pressure (ANSI/AWWA Standard C-651)

Pursuant to 25 Pa. Code Chapter 109 and DEP's *Public Water Supply Manual – Part II* ([383-2125-108](#)), water suppliers shall adhere to DEP and water industry standards and practices when repairing or replacing water mains to ensure that water quality is not compromised or degraded. Industry standards and practices include procedures for adequate flushing, disinfection, and microbiological testing. Practical application procedures based on the standard may also be found in AWWA's field guide entitled, *Disinfection of Pipelines and Storage Facilities*.

D. Best Management Practices Checklist for Main Breaks Which Result in a Loss of Positive Pressure (ANSI/AWWA Standard C-651)

The following checklist summarizes the best management practices to address main breaks resulting in a loss of positive pressure. It is important to note that this checklist is intended only to summarize the key points in ANSI/AWWA Standard C-651; this

checklist is not intended to be used in place of following the standard. Please refer to ANSI/AWWA Standard C-651 for more details and full procedures.

1. Minimize entry of contaminants

- ☐ Isolate the affected main segment.
- ☐ Shut off all affected service connections that lack adequate backflow prevention, where practical.
- ☐ Dewater excavation trenches prior to repairs. Disinfect wet trenches where practical or where evidence of contamination exists.

2. Disinfect the pipe

- ☐ Swab or spray pipe interiors and associated fittings with a 1% solution of hypochlorite prior to installation.
- ☐ Where practical or where evidence of contamination exists, disinfect the entire affected main segment using one of the chlorination methods in Standard C-651. Refer to Standard C-651 for detailed disinfection procedures.

Note: Leaks or breaks that are repaired with clamping devices while the main remains full of pressurized water may present little danger of contamination and therefore may not require disinfection.

3. Remove contaminants and dechlorinate chlorinated-waste discharge

- ☐ Flush the affected main segment until discolored water is eliminated and the disinfectant residual concentration in the water exiting the main is no higher than the residual disinfectant concentration in the distribution system.
- ☐ Dechlorinate the chlorinated-waste discharge by applying an adequate amount of reducing agent to thoroughly neutralize the chlorine residual remaining in the water. Refer to Standard C-651 for information about dechlorination procedures.

4. Determine effectiveness of procedures

- ☐ Measure the disinfectant residual concentration to verify establishment of an acceptable residual.
- ☐ Collect special follow-up total coliform bacteriological samples in accordance with Standard C-651 to confirm that contamination did not occur during repair or replacement activities. Refer to Table 1 for the minimum number of required samples. Bacteriological samples must be analyzed by an appropriately accredited environmental laboratory.

Representative sampling locations must be downstream of the main break or repair. If the direction of flow is unknown, samples must be taken both up and downstream.

| Table 1: Minimum # Daily Samples Required for Line Repair | |
|--|-----------------------------|
| Population Affected¹ | Minimum # of Samples |
| 1 – 500 | 1 |
| 501 – 1,000 | 2 |
| 1,001 – 2,000 | 3 |
| 2,001 – 3,000 | 4 |
| 3,001 – 4,000 | 5 |
| 4,001 – 5,000 | 6 |
| 5,001 – 7,500 | 7 |
| 7,501 – 10,000 | 8 |
| 10,001 – 25,000 | 9 |
| 25,001 – 50,000 | 10 |
| > 50,000 | 11 |

¹ **Population affected = # service connections x 2.7 people**

- ☐ Sampling should be continued until **two consecutive days of negative samples** are obtained.
- ☐ If follow-up total coliform sample results are negative for two consecutive days, go to checklist item #5 (complete recordkeeping) and record the details in your Repair Log.

Where practical, or where evidence of contamination exists, repaired or replaced water mains must be completely installed, flushed, and disinfected, and satisfactory bacteriological sample results must be received prior to returning the main to service.

As per Standard C-651, and as per the properly certified operator's best professional judgment, after the appropriate disinfection and flushing procedures have been completed, the existing main may be returned to service prior to the completion of bacteriological analysis in order to minimize the time customers are without water.

- ☐ If any follow-up total coliform samples are positive, ensure that the lab is also analyzing the samples for *E. coli*.
 - ☐ **If results are total coliform-positive only**, continue flushing, disinfecting, and collecting follow-up samples until samples are negative for total coliform bacteria.
 - ☐ **If results are positive for *E. coli***, notify DEP within one (1) hour and issue a BWA as soon as possible, but no later than 24 hours. Refer to DEP's *Policy for Issuing and Removing Water Supply*

Warnings ([383-2129-005](https://www.pa.gov/documents/000004/000004.pdf)) for additional information about follow-up actions.

5. Complete recordkeeping

- ☐ Record details of the main break in a Repair Log, including all follow-up coliform sample results. Retain the Repair Log on site and make it available to DEP upon request.

If a water supplier cannot comply with Standard C-651 and this policy for responding to a loss of positive pressure situation, water quality may be compromised. The water supplier shall notify DEP within one (1) hour of discovery of the loss of positive pressure to discuss whether Tier 1 PN is necessary.

E. Special Considerations

In certain situations, if it is in the best professional judgement of an appropriately certified Class E operator, the collection of bacteriological samples may be avoided. In order to avoid collecting bacteriological samples, **all of the following criteria must be met:**

- There is no evidence of contamination or a high risk of contamination.
- All repair parts are disinfected in accordance with Standard C-651, or, if service connections are shut off, the main is disinfected utilizing the slug chlorination method.
- Any area of repair is flushed thoroughly and background disinfectant residual levels of at least 0.2 mg/L (as required by 25 Pa. Code § 109.710) are reestablished.
- The water supplier has had no Level 1 or Level 2 assessments triggered under the Revised Total Coliform Rule in the last year.
- The water supplier is in compliance with the requirements of Pennsylvania's Water and Wastewater Systems Operators' Certification Act and associated regulations. Specifically, an available operator with the appropriate level of certification must make all process control decisions related to repairing or replacing the water main.
- The crew must utilize written standard operating procedures that are in conformance with Standard C-651 and this policy.

F. Maintain a Repair Log for Loss of Positive Pressure Situations

Water suppliers should record details of the loss of positive pressure event in their Repair Log; this log should include:

- Date, location, and cause of the loss of positive pressure

- If the cause is a main break, the type of repair needed to correct the break
- Time it was discovered
- Population affected
- Time of notification to DEP, name and phone number of DEP representative notified, and summary of conversation
- Length of time required to repair
- Type of disinfection method used
- Date and time disinfectant residuals were detected
- Date and time coliform bacteria samples were collected, or an indication that appropriate criteria were met to avoid bacteriological sampling
- Results of the coliform bacteria samples and the date results were obtained

The log should be made available to DEP upon request.

VI. DEP FIELD OPERATIONS REGIONAL OFFICES

For more information,
call the [DEP regional office](#) in your area or contact:

**Department of Environmental Protection
Bureau of Safe Drinking Water
P.O. Box 8467
Harrisburg, PA 17105-8467
717-787-9633**

To determine the contact information for your local DEP office, consult
DEP Office and County Health Department Contact Information by County ([3930-FM-BSDW0560](#)).