

Drinking Water News

A Newsletter for Pennsylvania's Public Water Systems

Published by the PA Department of Environmental Protection

Winter/Spring 2012

Water Management Deputate Reorganized

Joanne Nardone, DEP Operations and Monitoring

In September 2011, the Department of Environmental Protection (DEP) announced a new organizational structure with the intent to enhance its ability to fulfill the department's mission of protecting Pennsylvania's air, land and water from pollution and providing for the health and safety of its citizens through a cleaner environment.

Management staff evaluated the department's structure and looked for ways to assess operational efficiency, improve program coordination and enhance internal and external communications. The goal was to improve the department's responsiveness and ability to protect the commonwealth's natural resources.

In order to effectively implement these goals, DEP adopted several changes to the department's organizational structure. One of the objectives of the reorganization was to move DEP's focus back to essential environmental protection practices and permitting functions. The reorganization will improve coordination among staff in DEP's various programs, ensuring statewide consistency in enforcing the department's regulations.

The restructured Office of Water Management realigns and integrates programs operating under the same set of state and federal regulations. The new Bureau of Safe Drinking Water contains three divisions. The Division of Planning and Conservation focuses on facility permitting, source protection, and water use. The Division of Training, Technical and Financial Services will provide assistance with operator training and certification and systems efforts to enhance treatments and operations. The Division of Operations and Monitoring will coordinate the delivery and compliance monitoring of state and federal drinking water regulations, support field staff, and manage electronic records and communications.

The structure of the drinking water program in the regional and district offices is remaining essentially the same. The DEP website will be updated in the coming months to reflect these organizational changes.



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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It's that Time of Year: "CCRs"

Every community water system must distribute its annual water quality report (i.e. Consumer Confidence Report – or CCR) to each customer, and to DEP, **on or before July 1 of each year**. The reports are based on data from the previous calendar year.

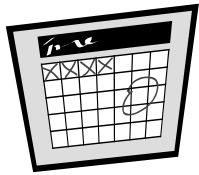
Systems must deliver a copy of their CCR to each customer and make a good faith effort to get reports to non-bill-paying consumers. The reports may be sent with water bills or as separate mailings. Community water systems serving 100,000 or more people must post their current year's report to a publicly-accessible site on the internet. A copy of the report should be kept on file for three years and made available to the public upon request.

On or before October 1 of each year, community water systems must deliver a CCR Certification Form to DEP. The form certifies that the CCR was distributed, and that its information is correct and consistent with the compliance monitoring data previously submitted to the state. The certification form (publication 3800-FM-WSWM0084) and is available on DEP's website at <http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-8854>.

Sampling Requirement Reminders for 2012

Sabrina Haydt, Compliance Assistance Specialist, SC Region

For Community and Non-Transient Non-Community systems serving 101-500 customers, the new compliance monitoring period for Synthetic Organic Chemicals (SOCs), Inorganic Chemicals (IOCs), and Volatile Organic Chemicals (VOCs) begins in 2012. Be aware that the 2009 General Update to Chapter 109 included some big changes from your previous monitoring requirements.



For SOCs, these changes require quarterly sampling for all 28 pesticides/herbicides, Dioxin, and PCBs during the first quarter of 2012; in the past, you may have only been required to monitor for certain SOCs every three years.

Systems may apply for monitoring waivers for asbestos, IOCs, VOCs (if applicable), SOCs, Dioxin and PCBs. If approved, your monitoring requirements could be reduced for certain chemicals. Consider the time and

effort related to preparing a complete waiver application, and be aware that submittal does not guarantee approval. It is very important to note that waivers are reviewed based on the presence of potential sources of contamination and the proximity of these contaminants to each source related to the entry point (EP) for which the waiver is requested. Therefore, thoroughly consider the potential sources of contamination before deciding which waivers to request and for which EPs.

Remember, until receiving written approval from DEP, conduct all required monitoring. Budget accordingly to monitor for all contaminants. Your monitoring requirements for 2012 can be found on the Drinking Water Reporting System (DWRS) website. The link to access this site is: <http://www.drinkingwater.state.pa.us/dwrs/HTM/Welcom e.html> or go to www.depweb.state.pa.us and type the keyword "DWRS" in the search box.

Accelerated Certification

Bill McNamara, Training, Technical and Financial Services

Recently installed or plan to install a new type of treatment, such as membrane filtration, at your facility? If so, have an operator that is properly certified to run this new type of treatment. Under the operator certification program, there is a license subclass for each type of treatment technology.



To add a new subclass to an operator's license, the operator must pass the appropriate subclass examination and have one year of experience operating the specific treatment technology. This would typically mean paying a properly certified contract operator to run the system for a year. However, the new operator certification regulation (Chapter 302 Administration of the Water and Wastewater Systems Operators' Certification Program), includes a provision for accelerated certification. An existing certified operator at a system may qualify for accelerated certification by completing onsite, DEP-approved training from the manufacturer or consulting engineer on the proper operation and maintenance of the new treatment technology and pass the appropriate subclass exam.

Manufacturers normally conduct onsite training after an installation, but to count for accelerated certification the course must be DEP-approved. Some manufacturers are already working with DEP to gain approval of their onsite training. If there is new technology being

installed, please contact DEP, who will assist the manufacturer or consulting engineer through the approval process.

For more information on the accelerated certification program, please contact Bill McNamara of the Training Section at 717-705-6350 or wmcnamara@pa.gov.

More Resources on DEP's Drinking Water Website

There are new pages and documents on the website. To find these new items, go to DEP's website at www.dep.state.pa.us and click on the "DEP Programs A – Z" link in the left-hand column. Then click on "D" for Drinking Water and click on the "Drinking Water" link. The "Drinking Water Website" file contains the search criteria and screen shots for the following topics:

- Drinking Water Home Page
- Drinking Water Topics A – Z
- Regulations page
- Lead and Copper Rule page (**NEW**)
- Stage 2 Disinfection/Disinfection Byproducts Rule page
- Drinking Water Regulations, Standards and Resources page
- Monitoring Waivers page
- Consumer Confidence Reports page

PaWARN Provides Valuable Assistance During Major Storms

Rod Nesmith, Program Manager, SC Region

A minor earthquake and two major storms kept PaWARN busy during late August and the month of September as high winds and floodwaters wreaked havoc on central and eastern Pennsylvania. PaWARN is Pennsylvania's Water/Wastewater Agency Response Network that locates emergency resources and personnel during a crisis situation.

On August 23, 2011, a 5.8 magnitude earthquake that originated in central Virginia was felt throughout much of Pennsylvania. PaWARN was activated and immediately surveyed its membership for damage assessments. Fortunately, only a few systems sustained minor damage from the earthquake and no resources were requested.

However, the earthquake served as an omen of what was to come as two major storms would soon pound the central and eastern portions of Pennsylvania, resulting in more than 25 emergency requests for assistance through the PaWARN network.

On August 27th, PaWARN was activated prior to Hurricane Irene and prepared for potential problems in the eastern portion of state, as was being predicted at the time by the National Weather Service. However, Hurricane Irene took many by surprise and pummeled the eastern half of the state, with northeast Pennsylvania taking the brunt of the storm.

PaWARN was no sooner wrapping up its response efforts to Hurricane Irene when Tropical Storm Lee dumped record-setting rain on central Pennsylvania from September 5 to 7, causing widespread flooding.

The following are some highlights from the PaWARN responses to the two storms:

- United Water of PA supplies a generator to the New Milford Municipal Authority which was in danger of exhausting its storage supplies and running out of water due to a prolonged power outage.
- PaWARN assists the City of Lancaster's wastewater system by helping it locate a sewage by-pass pump. Sewage backup was reaching a critical point and this request was considered high priority from the Pennsylvania Emergency Management Agency (PEMA).

- Through PaWARN, Mifflintown Municipal Authority supplies two trash pumps to the City of Lancaster that allows sewage to keep flowing and avoids a potential public sanitation crisis. Mifflintown's Mike Robinson graciously offers to have the trash pumps delivered to Lancaster from Juniata County.

- PaWARN assists the Derry Township Municipal Authority and the Swatara Township Authority with trash pumps. Both authorities' wastewater treatment facilities were completely submerged by flood waters.



- PaWARN assists the City of Harrisburg with locating a storm water inspection camera needed to assess the damages to its storm water drainage system.
- PaWARN assists the City of Lebanon in locating pumps and help with activating an emergency interconnect. PA American Water responded and provided the emergency assistance to Lebanon.

PaWARN also responded to several requests for water buffalos and bulk water tankers to the northeastern counties of Susquehanna, Wyoming, Luzerne and Lackawanna. Residents of these counties were enduring a prolonged power outage, flood damages and flood contaminated well water. United Water of PA and PA American Water went way beyond the call of duty supplying bulk water to several rural townships in northeastern Pennsylvania.

These back-to-back storms provided PaWARN with a real test of its emergency response capabilities. Through its well established network of utilities and its partnerships with DEP, PA Public Utilities Commission, PEMA and EPA, PaWARN was able to locate the needed resources and help distressed utilities and communities with potable water, equipment, supplies and personnel.

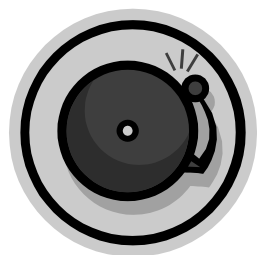
The Pennsylvania Section of the American Water Works Association, Pennsylvania Rural Water Association and the Pennsylvania Municipal Authorities Association all worked seamlessly together to help coordinate the PaWARN response efforts.

Join PaWARN now and become part of this important network of water and wastewater facilities dedicated to helping fellow utilities and the citizens of our communities when disaster strikes. Contact PaWARN Coordinator Mike Snyder at 717-774-8870 ext. 102 or at mikesnyder@pawarn.org for membership information or visit www.pawarn.org.

Responding to Entry Point Free Chlorine Residual Situations: Clarification Between Low Residual and No Residual

Jill Anderson, Compliance Assistance Specialist, SC Region

Community water suppliers should be familiar with the Groundwater Rule (GWR) found in Subchapter M of the Chapter 109 Safe Drinking Water Regulations. Under the GWR, all community water systems are required to maintain a residual disinfectant concentration of at least 0.40 mg/L free chlorine, or its equivalent at each groundwater Entry Point (EP). Community systems are also required to provide at least 4-log (99.99%) treatment of viruses, beginning in 2011 through 2013, based on the size of the population served. This treatment is typically achieved by maintaining a minimum free chlorine residual and adequate chlorine contact time before each EP.



As implementation of the GWR progresses, one important question that has emerged is how water suppliers are required to respond to situations involving low residual (below the required minimum) compared to no residual (non-detectable) at the EP, and

whether there is a difference between the two scenarios.

The minimum free chlorine residual required at each groundwater EP by §109.1302(a)(2) is 0.40 mg/L, or other minimum approved by the department via permit special conditions. This is a treatment technique requirement; it must be maintained at all times to continuously provide 4-log treatment of viruses associated with fecal contamination. Systems with approved 4-log treatment permits are required to conduct compliance monitoring in order to verify that the minimum residual is being maintained. Compliance monitoring consists of either continuous monitoring or daily grab sampling of the free chlorine residual at each EP. If the minimum free chlorine residual is not maintained and falls **below the required minimum for more than four continuous hours**, that low residual constitutes a breakdown in treatment according to §109.1307(a)(1)(ii). Follow up actions are required, including **one-hour notification to the department**, and **Tier 1 Public Notification (PN) to the consumers**, according to §109.408(a)(9).

In addition to the Subchapter M regulations, §109.202(c)(3) requires **continuous** disinfection of all groundwater sources at community water systems. This is not a new requirement. If the free chlorine residual at the EP is **non-detectable for any amount of time**, it is a failure to provide continuous disinfection and is potentially a violation of §109.202(c)(3), which constitutes a failure or significant interruption of a key water treatment process. Follow up actions in this situation include **one-hour notification to DEP** according to §109.701(a)(3)(iii)(B), at which time department staff will discuss the overall situation with you, including the potential need to provide **Tier 1 PN to the consumers**, according to §109.408(a)(10).



It is also important to note that there are various scenarios that can be considered a failure or significant interruption of a key treatment process, and that discovery of any of these scenarios requires **one-hour notification to the department**. If the EP free chlorine residual is below the required minimum, but it is due to circumstances that may not be resolved in a timely manner, meaning the residual may not recover within four hours, the situation may be considered a failure or significant interruption of a key treatment process. **DEP must be notified within one hour of this discovery**. Don't wait until the low residual has persisted for more than four hours to contact the DEP staff in this scenario. Additional follow up actions, including any PN that may be required, would be determined on a case by case basis.

The bottom line is this: if in doubt, call the local DEP office to notify your sanitarian. It never hurts to alert him or her to a situation, even if it turns out that the one-hour notification requirement was not applicable. Failure to report a situation that does require one-hour notification is a violation of §109.701(a)(3), and may lead to further violations if additional follow up actions are not initiated. It is always better to be proactive and prevent possible violations from occurring. Always feel free to call the sanitarian to report a situation or ask questions, otherwise he or she may need to call you at a later date to inquire about potential violations.

Accurate Free Chlorine Data Is Critical To Compliance

Ed Chescattie, Planning Section Chief, SC Region

If your water system uses chlorine as a primary disinfectant, it is necessary to accurately monitor and record the free chlorine residuals to ensure adequate treatment of viruses and pathogens. However, there are other factors that can adversely affect the accuracy of chlorine residuals and result in erroneous data, possibly violations. Careful consideration of the following items may help improve the reliability of chlorination practices and accuracy of your free chlorine data:

- Discuss the importance of maintaining adequate chlorination with all water system operators relative to public health protection. Make sure the operators fully understand the regulatory ramifications of inadequate chlorination.
- Clearly post all operational goals related to adequate chlorination; goals should be set at a level which provides a buffer above regulatory requirements. For example, establish minimum chlorine levels, maximum flow rates and minimum tank levels which provide slightly higher protection than the minimum regulatory log inactivation. Surface water treatment systems must consider how changing water temperature will affect these goals and revise goals seasonally because disinfection is more difficult to maintain in cold water.
- Update your Operations & Maintenance Plan now so that it clearly outlines specific actions that must be taken to maintain plant-specific chlorination goals. Consider the benefits of alarms to alert operators to degrading water quality as soon as goals are compromised, but before a regulatory violation occurs.
- Make certain that chlorine is sampled from the location specified in your permit. In general, proper chlorine residual compliance monitoring occurs at the entry point. Review your permit conditions. Questions may be directed to Safe Drinking Water staff at the local DEP office.
- Verify that the sampling location is representative. For a sample to be representative, it should be collected as close to the compliance monitoring location as possible.
- If sample tubing is used to deliver a sample to an on-line chlorine analyzer or lab sample sink, clean and/or replace this tubing routinely. In general, shorter lengths and smaller diameter sample

tubing will result in the most representative sample by reducing lag time.

- Get familiar with the basics of EPA Method 334.0 (please review the “Continuous Chlorine Residual Analysis and Method 334” article authored by Paul Handke in the Winter 2011 newsletter) and contact the manufacturer of the chlorine analyzer for further information and guidance relative to their instrument.

**EPA
Method
334.0**

- At a minimum and in accordance with Method 334, analyze a comparison sample between the on-line chlorine analyzer and bench top or handheld colorimetric chlorine instrument no less frequently than once every seven days. On-line amperometric chlorine analyzers can be operator-adjusted (following manufacturer recommended protocol) to match the results of a properly verified colorimetric bench top chlorine analyzer. Troubleshooting of inaccurate on-line colorimetric chlorine analyzers should occur via communication with the instrument manufacturer.
- It is important to routinely use verification standards to check the accuracy of the bench top or handheld chlorine analyzer. Contact the instrument manufacturer for more details and guidance.
- Installation of a “Y” or “T” on the sample influent line to on-line chlorine residual analyzers should help facilitate ease of grab sampling for comparison checks. Never sample from the effluent of an on-line chlorine residual analyzer which uses any type of reagents.
- With regard to grab sample analysis of chlorine, be certain all operators are using the correct type (Free vs. Total) and the correct range (10mL vs. 25 mL) of chlorine sampling reagents.
- Routinely check that all chlorine reagents on hand are within their expiration dates. Expired reagents should be properly disposed of; leaving them on the shelf may enable inadvertent use and incorrect sample results.
- Occasionally compare the step-by-step chlorine analysis technique with the exact technique specified by the instrument manufacturer. Over time, analysis techniques can unintentionally stray from suggested protocol and impact results.

- Visually inspect glassware used for grab sampling and replace as needed. Discolored, stained, or scratched glassware can impact chlorine results. Always remember to zero chlorine grab samples and do so using the same glassware used to run the sample.



- When considering the purchase of a new chlorine analyzer, be sure to research and ask preferred manufacturers which type of chlorine analyzer is best suited for specific needs. The system's water chemistry may impact the accuracy, reliability and preventative maintenance frequency of instruments differently. If the system operates intermittently, with multiple startup and shutdowns, be sure to discuss this with the instrument manufacturer to determine impacts to instrument calibration and stability. Some on-line chlorine analyzers are not well suited to intermittent operations. Whenever possible, it is best to conduct a trial run with the exact instrument under consideration.
- Review your emergency response plan and public notification requirements *now* to prepare responses to events of low chlorine residual. Contact the local DEP Safe Drinking Water staff to review regulatory public notification requirements related to the discovery of problems with chlorination.

From the Editor's Desk

Joanne Nardone, Operations and Monitoring

I've included the big news about our reorganization on page one, so I'm using my space to share this great "observation" from a DEP staff member in the northwestern part of the state:

Cholera – A waterborne disease / often fatal

Typical symptoms: Massive and rapid loss of water through diarrhea and vomiting / death often occurs 4 – 48 hours after symptoms appear

How Spread: Inadequate water or sewage treatment

Deaths worldwide annually: 100,000 – 130,000

(probably under reported)

Deaths in Haiti October 2010 – March 2011: 4672

Deaths in USA since 1995: 1 (and that was probably contracted overseas)

The value of not contacting cholera: priceless.

Thank you water operators!

Please help us share the word that "Drinking Water News" can be found on DEP's website at http://www.depweb.state.pa.us/portal/server.pt/community/public_drinking_water/10549. Release announcements and links to the newsletter are sent to PWS non-emergency e-mail addresses listed in PADWIS and to the e-mail addresses we have for PA-certified labs. If future availability notices should go to other addresses, please send those addresses to me at jonardone@pa.gov.

Joanne

Stage 2 Disinfectants/Disinfection Byproducts Rule (DBPR) – A Brief Overview

Dawn Hissner, Operations and Monitoring

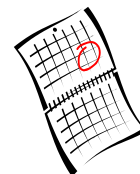
The public health benefits of disinfection are significant and well-recognized. However, these very disinfection practices pose health risks of their own. Although disinfectants are effective in controlling many harmful microorganisms, they react with organic and inorganic matter in the water to form disinfection byproducts (DBPs). As a result, the EPA has developed several regulations to address the risks posed by DBPs while ensuring that adequate treatment is maintained to control microbial pathogens.

The Stage 1 Disinfectants/Disinfection Byproducts Rule (DBPR) applied to all community (CWS) and nontransient noncommunity (NTNC) water systems that use a chemical disinfectant or oxidant and built upon the existing Total Trihalomethane (TTHM) Rule by regulating treatment practices at public water systems to minimize disinfectant levels and DBPs. The Stage 1

DBPR lowered the maximum contaminant level (MCL) for TTHMs and established a new MCL for five haloacetic acids (HAA5s). The Stage 2 DBPR enhances the Stage 1 DBPR and is intended to reduce exposure to DBPs and provide equal protection for all customers. CWS and NTNC systems are required to meet disinfection byproduct MCLs at each monitoring site in the distribution system by using locational running annual averages (LRAAs) to calculate compliance. The rule also defines operational evaluation levels (OELs) to identify areas with high DBP levels before a violation occurs.

Compliance monitoring under the Stage 2 DBPR begins April 1, 2012, for the Schedule 1 water systems. A Schedule 1 system is a water system that serves more than 100,000 people OR any CWS or NTNC system connected to such a system. In Pennsylvania there are approximately 60 Schedule 1 water systems. Compliance monitoring for the remaining systems will be phased in over the next 18 months based on the system's Schedule number. Schedule 2 systems begin monitoring October 1, 2012; and Schedule 3 and most Schedule 4 systems begin monitoring October 1, 2013.

(continued on page 7)



Systems required to conduct compliance monitoring under the Stage 2 DBPR are also required to complete a compliance monitoring plan and submit the plan to DEP prior to the applicable compliance monitoring date. However, systems that completed an Initial Distribution System Evaluation (IDSE) Report are not required to complete the compliance monitoring plan if the IDSE report contained all the required elements and if none of the sampling locations have changed. The compliance monitoring plan must list the monitoring locations, the justification, the DEP Site ID#, and the sampling schedule. To ensure the plan contains all required elements, use the template available from the DEP website at the following link: <http://www.elibrary.dep.state.pa.us/dsweb/View/Collecti on-10727>

A few tips:

- After beginning compliance monitoring under the Stage 2 DBPR, be sure to remind the lab to use the correct location ID#s when reporting TTHM/HAA5 results to DEP to avoid a monitoring/reporting violation. The ID#s should be in your IDSE or monitoring plan and will be in the 700 series (e.g. 700, 701, 702, etc.).
- If the IDSE report has been submitted, DEP may contact the system to clarify the sampling schedule. The instructions about the sampling schedule only state the specific week and month in which samples

will be collected. However, due to limitations of the data system, identify specific dates in each quarter (e.g. Feb 20, May 20, Aug 20, Nov 20) which fall near the timeframe originally selected in your IDSE. For example, if the IDSE indicated sampling the first week of June, you may select June 4th as the sampling date. There will be a week-long window in which to collect the samples, but the specific dates ensure that the samples will be evenly spaced throughout the year and will be collected around the same time in future years.

- When conducting quarterly compliance monitoring, the OEL for each location should be calculated once the third quarter of sampling is complete (& every quarter thereafter). EPA and DEP are developing assistance tools for performing this calculation and reporting any exceedances. Look for additional details in a future article.

For specific details about the Stage 2 DBPR monitoring requirements, refer to the D/DBP Rules Monitoring and Reporting Requirements Summary job aid at: <http://www.portal.state.pa.us/portal/server.pt?open=514 &objID=553892&mode=2>

If the website links don't work, or if the Schedule # is uncertain, please contact the local DEP office for assistance.

Electronic Reporting of Monitoring Data

Dawn Hissner, Operations and Monitoring

As part of the General Update to Chapter 109, electronic reporting of all drinking water compliance data via a secure DEP computer application is now mandatory. DEP has developed the Drinking Water Electronic Reporting System (DWELR) computer application for submitting data electronically. DEP-accredited laboratories were required to begin electronically submitting all drinking water analysis results to the Department in November 2009.



Water suppliers will be required to begin electronic reporting of results of on-site compliance monitoring conducted by the system (such as turbidity, disinfectant residual, alkalinity, corrosion control WQPs, etc.) within 90 days of receiving written notification from DEP. You must register to submit data in DWELR. Letters are being sent out in stages to water suppliers (based on system population) to allow adequate time for water suppliers that are not currently registered users to become registered. The larger water systems have already been notified; the remaining notifications will be mailed throughout 2012.

As an alternative, water suppliers may contract with an accredited laboratory or other approved third party to report the water system's data electronically to DEP. The contract must be made in writing.

Any data received on paper forms after the appropriate cut-off date specified in the letter will be rejected and the form(s) returned to the sender. There is one exception to this: data reported incorrectly that is not corrected before the tenth of the month must be re-submitted on specific paper forms (SDWA Corrected Data forms).

Water systems do NOT need to wait to receive notification from DEP to become a DWELR user and begin submitting data electronically. To become a registered DWELR user, please go to www.depweb.state.pa.us/watersupply/dwelr to obtain a registration form or contact the DEP Helpdesk at 717-772-5840 for information about setting up a user account.

Regulatory Update

The recent crush of regulatory packages related to Chapter 109 has thinned out. Activities to assist public water systems and their certified laboratories with compliance of the finalized regulations continue.

Proposed Regulations going through the approval and adoption process		
Regulation	Rule Summary	DEP Schedule
Revised Total Coliform Rule	<ul style="list-style-type: none"> ➤ The Revised Total Coliform Rule (RTCR) drops the former, non-acute (monthly) MCL for coliforms; implements an assessment and corrective action process in its place; and changes how monitoring frequencies are set. <p>Contact: Jeff Allgyer, 717-772-4015</p>	<p>2012 - 2013</p> <p>EPA final regulations anticipated</p>

Current efforts and reminders related to recently adopted regulations		
Regulation	Summaries and Reminders	What's Up
Operator Certification	<ul style="list-style-type: none"> ➤ Section 302.202 of the Operator Certification Regulations specifies that water system owners must complete and return an Available Operator Report and submit an annual service fee upon written request of DEP. ➤ The 2011 Available Operator Report & Chapter 302 Annual Service Fee was mailed to approximately 3,200 Pennsylvania water systems in May/June 2011. The fees were supposed to be returned within 60 days, but there are still about 700 systems that have not yet returned their report or annual service fee. ➤ DEP will distribute the 2012 Available Operator Report & Chapter 302 Annual Service Fee invoices in May/June 2012. <p>Contact: Scott Sykes or Dawn Hissner, 717-787-9633</p>	<p>May/June 2012</p> <p>Distribution of 2012 Available Operator Report and Annual Service Fee invoices</p>
Groundwater Rule	<ul style="list-style-type: none"> ➤ The intent of the Groundwater Rule is to provide for increased protection against microbial pathogens in public water systems that use ground water sources. ➤ Demonstrate by Oct. 1, 2012 how you intend to provide at least 4-log treatment at each Entry Point. ➤ Provide Department-approved 4-log treatment and conduct disinfectant residual monitoring (or other approved compliance monitoring) at each of your groundwater Entry Points by April 1, 2013. <p>Contact: Jeff Allgyer, 717-772-4015</p>	<p>October 1, 2012</p> <p>Plan due on how to achieve 4-log treatment at each entry point</p> <p>April 1, 2013</p> <p>Deadline to conduct approved compliance monitoring at each GW entry point</p>
Lead and Copper Rule Short Term Revisions (LCRSTR)	<ul style="list-style-type: none"> ➤ LCRSTR strengthens existing Lead and Copper Rule requirements regarding monitoring, treatment processes, public education, customer awareness and lead service line replacement. ➤ Systems must meet both action levels to remain on a reduced monitoring frequency. ➤ Systems must issue a Consumer Tap Notice that provides analysis results to consumers with sampled taps. <p>Contact: Dawn Hissner, 717-772-2189</p>	<p>New job aid:</p> <p>Lead and Copper Rule Short Term Revisions Job Aid</p>
Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DDBR)	<ul style="list-style-type: none"> ➤ Systems should submit their Monitoring Plan to the local DEP office before their compliance monitoring start date. ➤ Templates and other job aids are available at the Drinking Water website at http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-10727 <p>➤Contact: Dawn Hissner, 717-772-2189</p>	<p>April 1, 2012</p> <p>Start of compliance monitoring for Schedule 1 systems</p>

We're So Glad You Asked



We receive a lot of good questions from labs, system operators and water system officials, so we thought we'd share some of them in the hope of helping more water systems out there.

Q: When I had a positive coliform sample, the lab took check and raw water samples before I had a chance to shock the well with chlorine. Why can't I resample so I get negative results?

A: Check and raw water samples verify if there is total or fecal coliform present under typical operating conditions. Resampling is not allowed after shock treating the well. If the well needs to be shocked in order to get negative results, there is an obvious problem with the well or distribution system.

Q: When I completed my 4-log demonstration form, why did I need to use temperature and flow conditions that seldom exist at my system?

A: 4-log inactivation needs to be demonstrated for a worst case scenario. 5°C (41°F) may be typical in the area for only a few weeks each year and maximum design flow may be uncommon but if both situations occur at once, it is important the system be designed to provide 4-log inactivation.

Q: Do water suppliers need to report secondary contaminants "detects" in their Consumer Confidence Report (CCR)?

A: DEP does not require water suppliers to include "detections" of secondary contaminants in their CCRs. Suppliers have the option of reporting secondary contaminant data, as long it is not included in the main "detect table". EPA's "Preparing Your Drinking Water Consumer Confidence Report" publication states: "If you choose to report on secondary MCLs, or if your state requires this reporting, do so outside of the main table." (i.e. the detect table) NOTE: If DEP required operators to issue Tier 2 PN because of exceeding a secondary MCL, this violation should be included under the CCR's "Other Violations" section, including actions taken to correct the secondary MCL problem.

Q: What PN information must I provide to DEP?

A: After providing public notification to consumers, an operator must, within 10 days, send a copy of each type of notice distributed (e.g., newspaper article, press release to TV/radio, mail notices) to DEP along with a certification that the system has met all the

public notification requirements. Send certifications for both initial and any repeat notices.

Q: At the beginning of the month, I reviewed my Entry Point free chlorine residual data from my continuous analyzer to report last month's daily minimums for GWR compliance monitoring. I discovered that one day, several weeks ago, the residual was below the minimum required in my 4-log approval permit for more than four hours; but then recovered to adequate levels. I have safeguards in place (alarms, auto shut-off) but they apparently failed for a period of time and I didn't realize it. What should I do?

A: The first thing the operator should do is contact the local DEP office and notify the sanitarian as soon as possible, within one hour of discovering this situation. Since it occurred several weeks ago, the improperly treated water is most likely long gone from the distribution system, and a boil water advisory may not be the appropriate response.

It is important to note that this is a serious violation of several Chapter 109 regulations, including the Groundwater Rule Treatment Technique, and failure to issue Tier 1 Public Notice (PN). Therefore, customer notification is required. A PN template is available for this type of notice. The template includes the applicable Tier 1 language, including the contaminants of concern and health risks, as well as a statement indicating that customers should have been notified earlier. The sanitarian can provide more details regarding follow-up actions required.

The failure to identify and respond to a breakdown in treatment in a timely manner is a very undesirable situation. A breakdown in treatment should not go unnoticed. Therefore, it is important to troubleshoot alarm programming, shut-off set points and everything related to the cause of this situation. Immediate actions should be taken to prevent this situation from occurring again. For example, schedule routine tests of the alarm system to ensure that it is always working properly.

Q: How do I find out when Op-Cert exams are being offered?

A: Examination dates, locations, and times are listed on the Operator Certification Center webpage at www.depweb.state.pa.us. Click on "DEP Programs A-Z" in the left-side column, then "O", and then "Operator". The link to the current certification exam schedule will be on the right-hand side of the page. Be sure to bookmark the Operator Certification Center webpage for future reference.