A Newsletter for Pennsylvania's Public Water Systems

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Monitoring Waivers Deciding Whether or Not to Apply

Dawn Hissner, Chief, Operations Monitoring Section



Your water system has recently received, or will soon receive, a waiver application packet in the mail. There is a lot of information about waivers and monitoring in this mailing, but what does this really mean for your water system? For those of you that have questions about the mailing, please read on. For those of you that want to get straight to the waiver application, you may find the *Monitoring Waiver Application-Helpful Tips* article on Pages 4 and 5 useful.

Monitoring waivers are *optional*. The water system may choose to not apply for any waivers and conduct the required monitoring instead. Although monitoring is usually the more expensive option, it should be considered with respect to the time and effort needed to research and complete the waiver application. The monitoring results will also establish baseline water quality over a period of time.

If you choose to NOT apply for a waiver, your water system will need to conduct monitoring for Inorganic Compounds (IOCs) and Synthetic Organic Compounds (SOCs) more frequently than was previously required.*

Inorganic Compounds (IOCs)

- IOC monitoring for entry points (EPs) supplying ground water will be required every three years (triennially) in specific years – 2012, 2015, 2018, etc. There is no reduced monitoring without a waiver.
- IOC monitoring for EPs supplying surface water will be required annually. There is no reduced monitoring without a waiver.

Synthetic Organic Compounds (SOCs)

SOC monitoring is a bit more complicated.

- As of January 1, 2011, the frequency for SOCs that were previously waived or that were on a reduced triennial
 frequency was reset to an initial quarterly frequency. Once four consecutive quarters of results have been
 submitted, the frequency will be reduced as appropriate.
- If the system can demonstrate that initial quarterly monitoring was completed for an SOC in the past, the system should request that DEP grant a reduced frequency based on the historical results.
- The reduced monitoring frequency is based on the results of initial monitoring and may be annual or triennial.
 - o For any SOC that was detected (but remains reliably and consistently below the MCL), the frequency is reduced to annually.
 - o For any SOC that was NOT detected in all four quarters, the frequency is reduced to triennially.

*NOTE: Compliance monitoring for IOCs, SOCs (or VOCs) for which treatment has been installed must be conducted at least annually; these contaminants are not eligible for a waiver.

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If you chose to apply for a waiver, you must complete the appropriate module(s) in the waiver application, depending on which waivers are being requested. *Additionally*, some monitoring may still be required to qualify for the waiver.

- To qualify for an IOC waiver, the system must demonstrate that three consecutive rounds of routine testing (annual for surface water (SW), triennial for groundwater (GW)) were conducted and the results are reliably and consistently below the MCL. Results from the three most recent monitoring periods must be used.
- To qualify for an SOC Susceptibility waiver, the system must demonstrate that (at least) one sample was tested
 for that SOC and the result was not detected. Please note that quarterly monitoring is NOT required to qualify for
 an SOC susceptibility waiver. Historical results may be used.
- Monitoring is not required to qualify for an SOC *Use* waiver or to qualify for the Asbestos, Dioxin & PCB waivers.

If you do not have records of historical monitoring results, you can search DEP's Drinking Water Reporting System website to determine if monitoring was conducted and whether the results meet the waiver criteria. Refer to the "Drinking Water Reporting System (DWRS) Has Been Updated" article on Page 7 for details on accessing that website and searching for sample results.

Please note that waiver applications are to be submitted to the appropriate local DEP office. Remember that, even if you think you qualify for a waiver and submit the application, you are still responsible for conducting all required monitoring <u>until you have received notification that the waiver has been approved</u>. Simply submitting the application is not sufficient to guarantee a waiver will be approved.

What does an approved waiver signify? It depends on for which contaminant the wavier is approved. Waivers are granted for individual contaminants, so you may decide to apply for only some of the contaminants in a specific waiver module. Some waivers only grant a reduced monitoring frequency; others will mean that monitoring for that contaminant is not required for the remainder of the current compliance period.

The decision whether to apply for a waiver or to conduct monitoring is something each water system has to consider carefully, factoring in the cost of monitoring, whether sufficient historical data is available, the waiver fee, and the time and effort spent to research the land use around each source.

EarthWise Academy Upgrades

Bill McNamara, Chief, Training Section

DEP's web-based learning system has several new enhanced features for operators. The web address is: www.earthwise.dep.state.pa.us/edu.

View Your Operator Transcript

Enter EarthWise Academy using the address above and click "Transcripts". Enter your DEP Client ID number to view your transcript. You can now view your entire transcript or only courses that were completed during your current 3-year cycle.

Search for Approved Courses

Enter EarthWise Academy and click "Catalog" or "Calendar." The catalog allows you to define search parameters to find a course. The new calendar shows upcoming courses and locations. We are encouraging training providers to place their upcoming courses in the calendar.

Take a DEP Web-Based Course

The DEP offers several different web-based training courses for both drinking water and wastewater operators that count towards your continuing education requirements. The required security course is also available via this system. Most Web-based courses are worth two to four contact hours and cost \$30 per contact hour. To take a

course: Click on "DEP Web-based Courses"

in the left-hand menu of Earthwise.

Questions? Bill McNamara, Training Section Group Manager, wmcnamara@state.pa.us or 717-772-4018.

Drinking Water and Wastewater Systems Operator Certification Program Training Sessions

In partnership with the Pennsylvania Section of the American Water Works Association and Pennsylvania Rural Water Association, the Department of Environmental Protection is offering training for the operators and owners of the Commonwealth's drinking water and wastewater treatment systems. The main focus of the training sessions is to highlight the changes and requirements for certification as established by the Chapter 302 program regulations that were published Sept. 18, 2010. Certified operators who complete the training session will be awarded three (3) contact hours for continuing education credit. At the end of the session, attendees will be able to:

- Define their job responsibilities as an operator, permittee/owner.
- Get certified and maintain their operator certificate.
- Find the information they need to operate a water or wastewater system and stay in compliance.
- Know where to go to get help, when needed.
- Understand what actions can be taken to avoid enforcement actions by the Department of Environmental Protection.

Registration fee for the session is \$50. The sessions are from 9 a.m. to 12 p.m. as follows:

July 12th

Holiday Inn Clarion 45 Holiday Inn Rd Clarion, PA 16214

July 13th

Bel-Aire Hotel and Conference Center 2800 W. Eighth St. Erie, PA, 16505

July 14th

Holiday Inn Beaver Falls 7195 Eastwood Rd Beaver Falls. PA 15010 July 19th

Best Western (Genetti Hotel & Conference Center) 77 E. Market St. Wilkes-Barre, PA 18701

July 20th

The Inn at Reading 1040 North Park Road Wyomissing, Pa. 1960

July 21st

Ted Lick Wildwood Center, Oak Suite Room Harrisburg Area Community College, Harrisburg

To register, please contact: Norma Etters, Pennsylvania Rural Water Association, netters@prwa.com, 814-353-9302.

For further information on the training sessions, you can refer to either association's website at: http://www.paawwa.org for the Pennsylvania Section of American Water Works Association or http://www.prwa.com for the Pennsylvania Rural Water Association. You can also contact: Nancy Dinger at PAAWWA, nancydinger@paawwa.org, 717-774-8870.



Finding Topics on the Drinking Water Website

Deb Rotz, DEP Operations Monitoring and Training

Have you ever had trouble finding something on the drinking water web pages? If so, you are not alone. To help you find a few selected topics, we have a created a file "Drinking Water Website." It contains the search criteria and screen shots for the following topics:

- Online Chapter 109
- 2011 Chapter 109 index
- Document locator
- Consumer Confidence Reports page
- Monitoring Waivers page
- Public Notification page
- Lead and Copper Rule Short-Term Revisions document

The file contains a list of DEP Program A-Z words that link you to specific drinking water topics. This file is posted under the "What's New...." area of the Drinking Water home page. To find this page, click on the DEP Programs A – Z link from DEP's home page. Then click on "D" for Drinking Water and click on the "drinking water" link.

You may also find the new directory "Drinking Water Topic Links A-Z" helpful in finding information on drinking water topics. It is an alphabetical listing of drinking water topics links to specific web pages. There are also a few wastewater topic links such as wastewater home page, state revolving fund, operator training and certification. It's posted under the "What's New...." area of the Drinking Water home page at Drinking Water Topics A-Z.

Monitoring Waiver Applications – Helpful Tips

Sabrina Haydt, Compliance Assistance Specialist, SC Region

Many of you have received, or will soon receive, information regarding monitoring waivers for the 2011-2013 compliance period. Now that the Department has reviewed multiple waiver submittals, trends are noticeable with regard to areas of confusion and missing information. This article provides specific tips to help water systems with their own sources ensure the waiver application is complete and accurate. Consecutive water systems should refer to the "We're So Glad You Asked" questions on Page 11 for information on why you received the mailing.

Overall Considerations:

- Every application must include, at a minimum:
 - Module 1 (Completeness Report)
 - Module 7 (Site Map & Land Use Inventory)
 - The Module(s) for which waiver you are applying
 - All corresponding documents for each module (sample results, land use maps, etc.).
- Your application cannot be processed without all necessary information.
- Only one Module 1 is required per application.
- A separate Module 2-5 is required for <u>each Entry Point (EP)</u> for which you are requesting a waiver.
- A separate Module 7 is needed for each permitted source associated with that EP.
- For all modules, where laboratory results are requested, be sure to include copies of the three <u>most recent</u> <u>consecutive</u> rounds of monitoring.
- Within the Source Water Protection Information section of each module, there is a question which reads "Please describe the steps taken to determine land uses that potentially affect IOC, VOC, SOC concentrations or potential sources of contamination (depending on the specific module)."
 - It is very important to write a <u>detailed explanation of your efforts</u> to generate your list of potential sources of contamination and/or certify that potential sources of contamination are not present.
 - One of the best methods to identify sources of contamination is to visually survey the Zone II area around your source, look for sources of contamination, and interview applicable business and land owners regarding chemical storage and use.

Until you have received written approval from the Department you are responsible for conducting ALL required monitoring.

Module 1 (Completeness Report):

• <u>Be sure to include all permitted sources</u> associated with the entry point for which you are seeking a waiver. To receive waiver approval, you must evaluate and document the risk of contamination for every permitted source which supplies water to that particular EP.

Module 2 (IOC Waiver Request):



- If you answer "Yes" to question one (sources vulnerable to industrial sources of Cyanide) in "Section C," you are not eligible for a Cyanide waiver.
- If you answer "Yes" to question two (land uses that disturb the bedrock) in "Section C," you are not eligible for a waiver for any IOCs which are associated with the bedrock disturbance.

Module 3 (VOC Waiver Request):

- VOC waivers are a reduced monitoring waiver. If you answer "No" to the first question in "Section B", then you have never detected a VOC at that entry point and the Department would have already set your monitoring frequency to "reduced." In this case, you do not need to apply for a VOC waiver.
- VOC waivers can only be submitted for EPs associated with groundwater or GUDI sources; <u>if you have even one</u> permitted surface water source associated with an EP, you are not eligible for a VOC waiver for that particular EP.
- If you answer "No" to the second question (three consecutive years with no detects for VOCs) in "Section B" then you cannot receive a waiver for VOCs.
- If you check any of the boxes under the "Land Uses that Potentially Generate VOC" table in "Section C", then you are not eligible for a VOC waiver.



Module 4 (SOC Waiver Request):

- If you have a surface water source associated with an EP, you are not eligible for an SOC <u>susceptibility waiver</u> for that EP.
- Section "C", in the table titled "Land Uses that Potentially Generate SOCs":
 - If you checked the box indicating the presence of "Roadway or railroad tracks" and/or "Landfill or dump", that EP is not eligible for an SOC <u>use waiver for any SOCs</u>.
 - If you checked the box indicating the presence of "Lawn care or garden", that EP is not eligible for an SOC use waiver for any of the nine SOCs associated with lawn and garden products. These include:

 Glyphosate; Heptachlor; Heptachlor Epoxide; Methoxychlor; Simazine; 2,4-D; 2,4,5-TP; Chlordane; and Dalapon.
 - Be sure to verify that <u>all</u> land uses "checked" within this table are transferred to "Section B" of Module 7; in this section, it is also very important to list distances from each of your sources to all land uses (including roadways).
- If applying for an SOC <u>susceptibility waiver</u> you must submit the most recent SOC data to indicate no detections for every SOC for which you are requesting a susceptibility waiver. If you do not have this data, you are not eligible for an SOC susceptibility waiver.
- If you have had a previous detect for a particular SOC, you must submit three subsequent consecutive years of annual monitoring for that SOC showing no detections.

Module 5 (Asbestos, Dioxin, and PCBs Waiver Request):

- Asbestos monitoring occurs at two locations, at the EP and within the distribution system. Therefore, a waiver for monitoring at each of these locations is based on separate criteria.
 - EP asbestos waivers are based on the presence of asbestos bearing rock or other sources of asbestos in proximity to your source.
 - If you have asbestos-cement pipe in your distribution system and you have optimized corrosion control treatment (OCCT), then you are eligible to receive a distribution system asbestos waiver.
- OCCT is achieved for small and medium systems by not exceeding the lead and copper action levels. OCCT is achieved for large systems by meeting the action levels and maintaining compliance with water quality parameters.
- For dioxin and PCB waivers, be sure to conduct a survey of industrial sites, Superfund sites and any other facility
 that might have used either of these contaminants within 1,000 feet of your groundwater sources or within one
 mile upstream of your surface water sources.
- In addition to the industrial survey for PCBs, identify if there are any electrical transformers (on poles or at ground level) within 1,000 feet of your groundwater sources or within one mile upstream of your surface water sources.
- If you identify transformers are present, you must conduct an investigation to verify that these transformers are
 considered PCB free. The best option is to contact the electrical supplier to inquire if they can verify that the
 transformers are PCB free. This can be done based on transformer age (PCB ban on May 31, 1979), transformer
 tags, or specification plates. Your electric company should be able to provide you with useful information or
 guidance to help with your investigation.

Module 7 (Site Map and Land Use Inventory):

- There must be a Module 7 submitted for each **source** listed in Module 1.
- You may submit <u>one</u> land use map, if all sources and surrounding land uses (including roads) can be included on one map.
- Remember to include the distance from each source to each land use within your Zone II and provide a scale reference on your map.
- If a rigorous delineation (hydraulic model from approved Source Water Protection Report) is available, it can be used in place of the default ½ mile radius (groundwater sources) or the 10 mile upstream radius (surface sources).

Potential Benefits of an Active Source Water Protection Program for Monitoring Waiver Applications

Cathy Port, DEP SCRO

Many drinking water operators have been busy working on IOC, VOC, and/or SOC monitoring waiver applications and sampling for contaminants that they've never sampled before. Anyone who's spent time on this effort has probably asked, "How can I make this process easier or increase my chances of obtaining a waiver?" One program worth considering is Source Water Protection (SWP).

Upfront, it's important to note that having a SWP Plan does NOT result in an automatic monitoring waiver approval. However, a SWP Plan can definitely make the waiver application process a little easier; and an *approved, updated, and active* SWP Plan may even increase your chances of obtaining approval (we'll explain how, later in this article).

First, let's define a SWP Plan and Program. A SWP Program is a local community-based effort to protect drinking water sources. A SWP Plan is the road map for implementing source water protection efforts at the local level. The elements of the SWP plan most applicable to water suppliers working on monitoring waiver applications are the source water protection area delineations and the inventory of potential sources of contamination (PSOCs).

When a system is developing a SWP Plan, one of the first steps is a delineation of the surface land area that can contribute flow to the source; which may be referred to as any of the following: source contribution area, vulnerability assessment area, source water assessment or protection area, Zone II for wells, or Zone B for surface sources.

Delineations can have varying degrees of complexity. For ground water sources, the least complex delineation is the default ½ mile radius. More complex is a GIS-based model that considers direction of groundwater flow (which is the basis for the keyhole-style delineation in Source Water Assessment Reports). For any source, the most complex delineation (which is required if a system plans to use regulatory land-use controls for managing the contribution area) is a rigorous delineation. A rigorous delineation requires a site-specific analysis of the factors that control water flow to the source (under the auspices of a Professional Geologist) and should be the best representation of Zone II or Zone B.

So how can a representative delineation help with completing your monitoring waiver application? When completing your application, you may use the delineation map that was produced as part of your Source Water Assessment or SWP Plan as a basis for completing the map in Module 7 of the application. Depending on the local site conditions, (geology, topography, pumping rate, etc.) your SWP delineation may cover a smaller area than the default ½ mile radius for a well or the default 10-mile semi-circular radius that is recognized as the default source contribution area in the monitoring waiver application for a surface water intake. Most importantly, you will be evaluating the best available delineation area, which means you will be focusing on the PSOCs most likely to impact your drinking water source.

The next step in developing both a SWP Plan **and** completing a monitoring waiver application is developing an inventory of PSOCs within the Zone II or Zone B area. This is done through a comprehensive analysis of land use and facilities within the Zone II or Zone B (using available environmental databases and field checking the information). You should be sure to use the most up-to-date, field-checked information (this is where the Steering Committee can help) on land use and PSOC inventory to complete the table in Module 7 and the information in Modules 2 (IOCs), 3 (VOCs) 4 (SOCs) and 5 (Asbestos, PCB, Dioxin) as the basis for requesting reduced monitoring (IOCs, VOCs) or elimination of monitoring through USE or SUSCEPTIBILITY waivers (SOCs, asbestos, dioxin, PCBs). It is important to note, if you do discover that there is the potential for current or previous use, including transport, storage, or disposal of contaminants within Zone II or Zone B, the waiver **may** be denied regardless of whether or not your system has a SWP Plan.

While having a SWP Plan does not guarantee that monitoring waivers will be approved, it definitely does help in completing the monitoring waiver application. The information in your SWP Plan can also help you analyze whether or not it is cost-effective to complete and submit the waiver application. The application fee and the time required to complete the application may outweigh the cost of conducting the monitoring, especially if your sources are vulnerable based on the proximity of PSOCs and impacting land uses.

So how may an approved, updated, and active SWP Plan and Program increase your chances of obtaining monitoring waiver approvals? Since the goal of an active SWP Plan is to reduce the potential for source contamination, the actions you take via local Steering Committee efforts can reduce or eliminate potential sources of contamination – both point and non-point.

In conclusion, if you have a SWP plan that's been collecting dust, consider taking it off the shelf and trying to breathe new life into it. If you haven't worked on SWP plan, consider contacting your regional DEP office to find out what resources may be available to help you with your efforts.

The Drinking Water Reporting System (DWRS) Has Been Updated

Jeff Yorty, DEP Operations Monitoring and Training

The Drinking Water Reporting System (DWRS) webpage allows public access to public drinking water systems' sample history, inventory information and recent violation history. Based on selection criteria provided by the user, information is displayed for a single water system or for multiple systems. The link to directly access the DWRS is: http://www.drinkingwater.state.pa.us/dwrs/HTM/Welcome.html or you can go to www.depweb.state.pa.us and type the keyword "DWRS" in the search box.

The Drinking Water Reporting System provides:

Public access to all <u>Sample Results</u> submitted to the Pennsylvania Safe Drinking Water Program <u>since 1993</u> (previously provided only for the last five years) for all public water systems in the Commonwealth. A new screen will list each year, and the number of water sample data available for that year. You may select each year individually.

Public water system managers and operators, who are applying for Monitoring Waivers, will find the Drinking Water Reporting System an excellent resource for past monitoring records. Here you can see if your water system qualifies for Reduced (triennial) Monitoring for VOC Contaminants, or if Initial Monitoring was conducted for SOC Contaminants, and SOC test results required for Susceptibility Waiver applications.



- You can download data to your computer as a csv file and paste multiple years into one spreadsheet, or
- You can download each year one year at a time or each page of each year to pdf files. (this is new)
- Inventory Information and Monitoring Requirements for all public water systems in the Commonwealth.

If you don't know your sample location ID numbers, the different reports in the inventory information provides the ID numbers for sources, treatment plants, and entry points. For security reasons, some details about these facilities (such as location details) are not provided.

Public water system managers and operators can find the monitoring requirements for IOC, VOC, SOC, and Radiological Contaminants, fairly accurately.



- The Monitoring Requirement Report contains a vast amount of data which may not be displayed in a single page. Reports for the larger water systems may be separated into individual reports for each sample location (such as Distribution, each Entry Point, and Maximum Residence locations).
- Remember, the monitoring waivers issued through 2010 for IOCs (including Asbestos) and SOCs (including PCBs and Dioxin) expired on Dec. 31, 2010. Refer to the articles "Monitoring Waivers Deciding Whether or Not to Apply" on Page 1 and "Monitoring Waiver Applications Helpful Tips" on Pages 4 and 5 for additional information regarding the waiver protocol and changes to monitoring requirements.
- Public access to the <u>Violation History</u> of all public water systems in the Commonwealth. This includes
 monitoring and reporting violations and resulting enforcement actions taken against a water system in the last five
 years.

Public water system managers and operators can keep track of Safe Drinking Water violations that have occurred or have not yet been resolved.

The DWRS is updated nightly, so it's important to check this site often to ensure changes in a source or entry point status are correct and to also stay current on changes to your monitoring requirements.

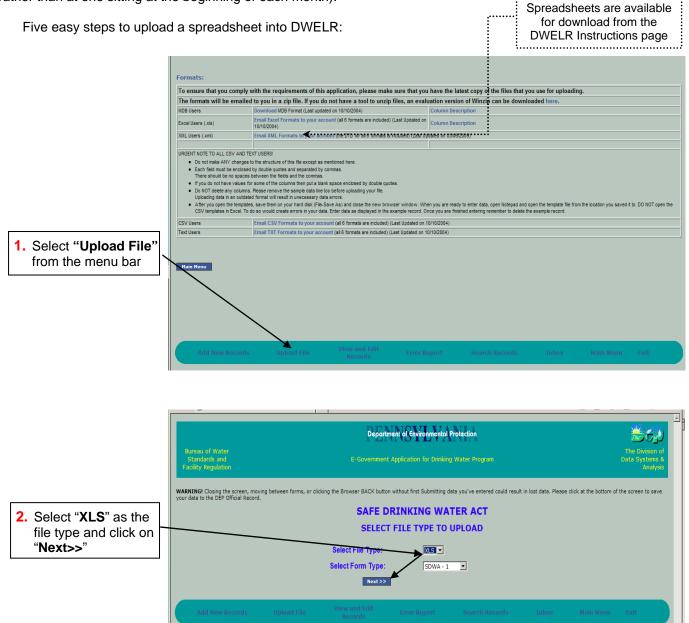
Why Not Upload a Spreadsheet of Daily Free Chlorine Residual Data into DWELR?

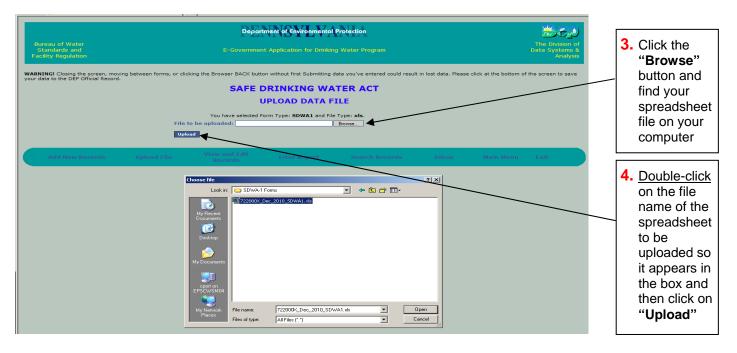
Jeff Yorty, DEP Operations Monitoring and Training

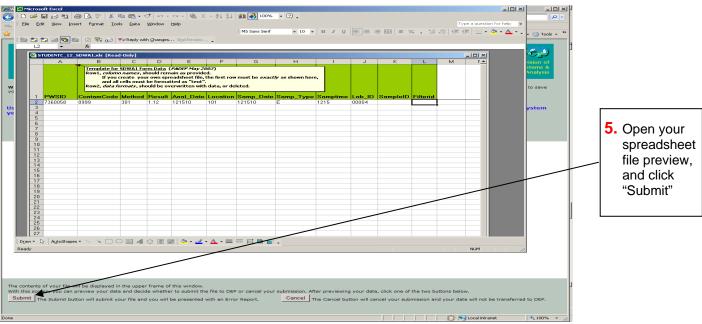
April 1, 2011 marked the beginning of the Groundwater Rule compliance monitoring requirements for community public water systems serving greater than 500 persons. After receiving approval for operation of a 4-log disinfection system, community systems (and noncommunity systems that "trigger") are required to monitor daily, record the free chlorine residual and the time of day when the grab sample was collected, or when the free chlorine residual was lowest (for systems that continuously monitor and record free chlorine residuals), and to electronically report the daily free chlorine readings (and the time of each day) using the Drinking Water Electronic Reporting (DWELR) system (due by the 10th of the following month).

The form used for daily reporting of free chlorine residuals is the SDWA-1 form. This form requires a line entry for each day of each month for each Entry Point. Systems with multiple entry points will have many line entries on the SDWA-1 form each month.

The spreadsheet upload menu option allows the water operator to complete the spreadsheet throughout the month (rather than at one sitting at the beginning of each month).







IMPORTANT NOTES:

- 1. Submitting the spreadsheet data into the SDWA-1 form does not submit the data into DWELR. You will have to hit "Submit" (at the bottom of the SDWA-1 form) to complete your data submission into DWELR.
- 2. You must use the spreadsheet developed by DEP (see below) for DWELR upload. The column headings (in green) and the format of the data entries may *not* be changed. Dates (no dashes and slashes) and times (military time) are entered numerically.



Regulation Implementation/Training Information and Updates

Since most of the regulatory packages related to Chapter 109: Safe Drinking Water we've been working on for the last couple of years are now in place, we've decided to redesign this page to show activities and updates related to the implementation of the new and newly-revised regulations. If you have questions about how to comply with any of the rules, you can contact the person(s) indicated or send them to the editor at jonardone@state.pa.us.

Regulation	Rule Summary	Implementation/Training Info
General Update to Chapter 109	 Incorporates requirements to obtain and/or maintain primacy for the Phase II/V, Filter Backwash Recycling, Lead and Copper, and Radionuclide Rules Revises the monitoring waiver protocol. Improves data quality and compliance. Mandates electronic reporting to DEP Contact: Lisa Daniels, 717-772-4046 	See article on page 7. Resources and tools, (ex: monitoring waiver components, available on the DEP Monitoring Waiver website. Materials from 2010 training available upon request: DEPWSTechTrain@state.pa.us
Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DDBR)	 Requires additional compliance monitoring for community and noncommunity water systems using a primary disinfectant other than UV for trihalomethanes and haloacetic acids. Contact: Dawn Hissner, 717-772-2189 	Implementation for larger systems begins in 2012. Training for water suppliers: 2012-2014 Monitoring Plan template and instructions for the Disinfectants-Disinfection Byproducts Rules on DEP elibrary
Enhanced Treatment for Cryptosporidium	 Updates microbial treatment regulations Targets PWSs with higher risk from Cryptosporidium Requires filtered systems to monitor source water to establish if any additional treatment must be provided. Contact: Bill Beck, 717-772-2261 	Tools on the DEP elibrary - The Membrane Filtration Control Limits DEP Notification Form - The Direct Integrity Pressure Decay Testing Report Form & the Instructions (check with your district office for guidance)
Groundwater Rule (GWR)	 Incorporates EPA's GWR to provide for increased protection against microbial pathogens in PWSs with ground water sources. Contact: Jeff Allgyer, 717-772-4015 	Training continues through July 2011. The training is co-sponsored by Penn State ETC For information: www.hbg.psu.edu/etc/
Operator Certification	 Implements the Water and Wastewater Systems Operator's Certification Act to ensure compliance with EPA requirements. Formalizes requirements for testing, training and experience to receive and maintain certification. Requires operator criminal history records from the PA State Police as a certification condition and security training for certificate renewal. Contact: Nicki Kasi, 717-772-4053 	The main focus of the training sessions is to highlight the changes and requirements for certification as established by the Chapter 302 program regulations that were published Sept. 18, 2010.
Lead and Copper Rule Short Term Revisions (LCRSTR)	 Incorporates federal Lead and Copper Rule requirements regarding monitoring, treatment processes, public education, customer awareness and lead service line replacement Contact: Dawn Hissner, 717-772-2189 	2011 Chapter 109 Index has been revised to include citations for the LCRSTR which are now highlighted in blue in the index. A new Lead and Copper Rule Short-term Revisions (LCRSTR) summary document describes each revision.
Fees	 Will amend fees to cover department costs Contact: Kevin McLeary, 717-772-4464 Lisa Daniels, 717-772-4046 	On Hold

From the Editor's Desk Joanne Nardone, DEP Operations Monitoring and Training Division

"Drinking Water News" availability notices are sent to non-emergency e-mail addresses listed in PADWIS. If notices should go to other e-mail addresses at your water system, please send those addresses to jonardone@state.pa.us. Current and past editions of "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. If you don't have Internet access, submit your mailing address to Joanne Nardone at the DEP Bureau of Water Supply and Facility Regulation, 400 Market St., Harrisburg, PA 17109-8467. Limited hard copies <a href="mailto:

.... And Thank You for providing clean, safe drinking water to so many Pennsylvania citizens and visitors! Joanne

We're So Glad You Asked



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

Q: The 2010 census showed my city's population was 12,800, so I want to reduce my monthly coliform samples from 15 to 10. My DEP Sanitarian says I need to sample 15 times per month because my system's population of 15,000 in PADWIS is accurate. Why is DEP's definition of population different from the census?

A: The DEP definition of population served by your PWS includes <u>all</u> persons who directly receive their water from you. This would include non-residential users as well as residential users in your municipality. The census only counts the residents in your city. Another factor may be if your system provides water to parts of neighboring municipalities. Those additional people would also be included in your system's population but not in the census population of your city.

Q: What can I do to complete my 4 log groundwater treatment application correctly?

A: For systems with 100–500 population, the application is due Oct. 1, 2011. For systems with less than 100 population, the application is due Oct. 1, 2012. Some of the common problems seen in applications are:

- No documentation for water temperature above 5°C or the data is very old
- Missing or confusing diagram of the system
- Information in the application that doesn't match the PWS permit (i.e. permit shows a 5,000 gallon tank but the 4 log application shows a 10,000 gallon tank).
- Unrealistically high baffling factor assigned with no supporting documentation
- Claiming full volume of filter tank (without deducting the volume of the filter media)
- Wrong identification for entry point such as calling EP 101 the Church Street treatment plant.

Q: My system has two wells, each serving a separate distribution system. When I had a positive coliform sample in one system, why did I need to take a source sample from each well?

A: You are only required to sample from the well(s) in the system that had the positive sample provided you have obtained advance written approval of a representative sampling plan. This request can be as simple as "If we have a positive coliform sample in distribution system A then we request to sample only well A. If we have a positive coliform sample in distribution system B then we request to sample only well B." Until you have received written approval of your request, you are required to take a source sample, in response to a positive coliform distribution sample, from every well in your PWS that is permanent, reserve, seasonal or interim unless it has approved 4 log treatment.

Q: I am a consecutive system (all of our water is purchased), so why did I receive the monitoring waiver mailing?

A: Consecutive systems received the waiver mailing for two reasons. The first relates to the waiver for Asbestos, which has two parts - source water vulnerability and distribution system vulnerability. Consecutive systems need to apply for the Asbestos distribution system waiver by completing Modules 1 and 5 in the waiver application. Module 5 asks if there is any asbestoscement pipe in the distribution system, and if so, to verify that the system is meeting the lead and copper treatment technique (meeting the lead/copper action levels and WQPs if corrosion treatment has been The second reason consecutive systems received the waiver mailing is to remind them that they may be required to conduct IOC, VOC and/or SOC monitoring if the seller doesn't conduct the required monitoring or if the test results from the sellers sampling indicate an MCL exceedence. Consecutive systems should contact the local DEP office if they receive a PN from the seller about missed monitoring or an MCL violation.



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