



July 15, 2015

Ms. Lisa Daniels, Director
Bureau of Safe Drinking Water
P.O. Box 8467
Harrisburg, PA 17105-8467

**Re: Comments on the Pre-Draft Proposed Disinfectant Residual Requirements Rule
(Chapter 109 – Safe Drinking Water)**

Dear Ms. Daniels:

The Small Water Systems Technical Assistance Center (TAC) Advisory Board met on April 30, May 18 & 26, and June 16 & 30 to continue discussions regarding the Pre-Draft Proposed Disinfectant Residual Requirements Rule. These requirements were originally included in the Pre-Draft Proposed Revised Total Coliform Rule (RTCR), which was presented to and discussed with the TAC Board on June 18 and September 23, 2014. However, on April 21, 2015, the Environmental Quality Board (EQB) approved the proposed RTCR with modifications. The modifications included splitting out the “Non-RTCR” provisions for additional stakeholder input. The motion was made with the expectation that the “Non-RTCR” provisions would be revisited in short order.

On April 30, 2015, the TAC Board voted to recommend that the Department further split the “Non-RTCR” provisions to focus solely on the disinfectant residual requirements and the minor corrections needed to obtain primacy. The May and June meetings provided focused input from stakeholders and additional discussion on the disinfectant residual requirements.

The TAC Board approved the following comments at its June 30, 2015 meeting:

1. **§§109.202(c)(1)(ii)(B) & 109.301(1)(i)(C)**: The revision to the entry point disinfectant residual level from 0.2 mg/L to 0.20 mg/L should be deleted; the entry point disinfectant residual level should remain at 0.2 mg/L. Strip chart recorders cannot record measurements to two decimal places, and water systems would be required to upgrade to more costly SCADA systems in order to meet the proposed requirement. The motion passed by a vote of 10 to 3.
2. **§§109.301(1)(i)(D) & 109.301(2)(i)(E)** should be revised as follows:
 - Subclause (II) should state “A public water system shall monitor the disinfectant residual at representative locations in the distribution system at least once per week.”
 - Subclause (III) should be deleted.


Additionally, clauses (B) and (C) in **§109.301(13)(i)** should be revised to match this language.

Daily monitoring of disinfectant residuals in the distribution system is too costly and burdensome. The RTCR should result in more representative and evenly spaced monitoring throughout the month which will ensure that samples are collected on multiple days within each week. The motion passed by a unanimous vote.

3. **§109.301(1)(v)**: The monitoring requirements for CT calculations for *Giardia* and viruses should be deleted and deferred to a future Chapter 109 revision. There are too many variables for calculating CTs and this would be an additional burden for most systems. The motion passed by a vote of 7 to 6.
4. **§109.701(a)(2)(i)(C) & (D)**: The reporting requirements for CT calculations for *Giardia* and viruses should be deleted and deferred to a future Chapter 109 revision. There are too many variables for calculating CTs and this would be an additional reporting burden for most systems. The motion passed by a vote of 7 to 6.
5. **§109.701(a)(2)(iv)**: This section should not be deleted. HPC should be kept as another tool to demonstrate compliance with the distribution system disinfectant residual treatment technique. The motion passed by a vote of 12 to 0, with 1 abstention.
6. **§109.710**: This section should be revised to change the minimum required disinfectant residual from 0.20 mg/L to 0.1 mg/L for both free and total chlorine, 95% of the time. The motion passed by a vote of 8 to 5.
7. **§109.715(a)(1)**: This section should be revised as follows “A monitoring plan that may include monitoring and recording of the following parameters” because the nitrification control plan should be system-specific, and not all water systems will need to monitor for all parameters listed. The motion passed by a vote of 8 to 5.

Thank you for the opportunity to comment.

Sincerely,


Ms. Serena DiMagno
Chairperson