PHILADELPHIA WATER
EST. 1801

PARTNERSHIP FOR SAFE WATER

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

Re: Philadelphia Water's Comments to the Proposed Revised Total Coliform Rule (RTCR)

Summary of Comments to the Environmental Quality Board (EQB)

Dear Board Members:

Philadelphia Water (PW) hereby submits its comments to the proposed rulemaking and proposed changes to Chapter 109 relating to the implementation of the Federal Revised Total Coliform Rule (RTCR).

A brief summary of those comments are contained below. Please refer to the attached full formal comments for specific comment details and underlying support for PW's responses.

- **Remove all language that is inaccurate and inconsistent with the federal RTCR regulation language.** These inaccuracies and inconsistencies do not reflect the federal regulation and, if not removed, will foster confusion within the drinking water profession.

- **Allow flexibility in sample siting plans and incorporate the EPA's RTCR by allowing public water systems utilizing advanced technologies to develop better alternative repeat sampling plans than the 5 upstream/downstream requirement, which never had any demonstrated scientific background.** A Public Water Supplier (PWS) that can select, in real time, the most valid upstream and downstream sample locations, is better able to meet the intent of the rule and strengthen public health protection.

- **Prohibit overuse of public notification for issues that do not in themselves signify a public health threat.** This overuse will erode public trust in public water systems and could desensitize the public to the importance of notifications if they begin to hear them too often for issues that are not truly related to public health.

- **Prohibit the use of Level 1 and Level 2 Assessments outside of RTCR.** Federal regulation designed assessments to specifically respond to RTCR issues, not issues outside of RTCR.

- **Better clarify Level 1 and Level 2 Assessment Triggers through incorporating federal guidance.** There is language in the chapter 109 revisions regarding assessment triggers that does not incorporate the federal RTCR regulation.

- **Allow individuals designated by the public water system (and not necessarily "certified operators" or "professional engineers") to be eligible to submit alternative repeat monitoring location plans and conduct RTCR assessments.** These designated individuals, such as water quality scientists and engineers, have vast experience in distribution system water quality and are well qualified to submit an alternative repeat monitoring location plan and conduct RTCR assessments.

- **Clarify which samples dictate how subsequent repeat samples under RTCR are collected.** Both EPA and PaDEP do not clearly communicate appropriate follow up requirements regarding repeat sampling under RTCR.

Philadelphia Water actively supports the EPA's Federal Advisory Committee process, in which the federal RTCR was carefully developed. The Federal Advisory committee worked over many years and with the input of the nation's experts on this topic, to move public water supply practice and regulatory oversight in a strong and positive direction. We strongly recommend that PaDEP's RTCR follow as closely as possible the federal RTCR.

Thank you very much for the opportunity to comment.

Sincerely,

David Katz
Deputy Commissioner
Compliance
Philadelphia Water