

**SUEZ WATER PENNSYLVANIA**

Mary Neutz  
Water Quality Manager  
2000 First State Boulevard  
Wilmington, DE 19804-3569  
(302) 304-5353  
Mary.Neutz@suez-na.com



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

**Re: Comments Regarding Proposed Rulemaking [25 PA Code Ch. 109] Safe Drinking Water Revised Total Coliform Rule**

Dear Environmental Quality Board:

Suez Water is pleased to submit our comments regarding the proposed rulemaking for the revised total coliform rule. Suez Water serves a population of over 165,000 in 40 communities across Pennsylvania including small, medium and large public water systems which consist of four surface water treatment plants, 3 surface water systems, 11 ground water systems, one GUDI well, and one consecutive system. It is imperative to our Public Water Systems (PWS) that we maintain a level of adaptability with our monitoring programs that will allow us to be flexible to real world operating conditions without adding a level of unnecessary administrative burden to both the PWS and the DEP. With this objective in mind we have reviewed these proposed regulations and compiled the following comments:

**Sample Site Plans – Section 109.701(a)(5)**

The proposed regulation requires that sampling site plans include higher level of detail than required by the federal RTCR which will significantly increase the burden of implementing and administrating this regulation. In addition to revising all sampling site plans to be representative of water throughout the distribution systems per the federal rule, the proposed rule requires PWS to identify all repeat samples on the sample site plans instead of developing a Standard Operating Procedure (SOP) as allowed by the federal rule [40CFR 141.853(a)(5)(i)]. This requirement triples the amount of work required to field survey, identify and validate new sample locations. In addition the proposed rule requires that the PWS provide a description of the accessibility of all sampling sites and a sampling schedule. Suez Water proposes that these items should be addressed through the submittal of an SOP along with the sample site plan which identifies all routine sampling locations. This SOP would identify how repeat samples and alternate repeat sample locations are selected, standards for sampling accessibility, and an explanation of the sample collection schedule.

To give an example of how the proposed regulations create an unnecessary administrative burden, in the Suez Water's Harrisburg System we are required to take 100 samples per month. Since the proposed regulation allows for sample locations to be sampled more than once in a month we currently have 50 sample locations on the proposed RTCR. If we are required to identify the upstream and downstream repeat sample locations for each routine sample location it will triple the

number of sample locations that must be located, verified and submitted to by DEP. Each sampling location must be carefully selected and inspected to verify reliable sampling taps and determine accessibility. This is a very time consuming process for a sample location that has a low probability of ever being used. For this one system alone we will be required to maintain a sampling plan with a total of 150 sample locations and each time there is a change due to accessibility we will have to submit a revised sampling plan to DEP. This proposed change will increase both the PWS and DEP's administrative burden for sampling locations burden three fold.

An analysis of the TCR data for the Suez Water Harrisburg system from 2010 through 2014 demonstrated that out of 6,000 required total coliform samples only 19 or 0.32% of the samples were positive for bacti and none of these samples were E.coli positive. This data demonstrates that the frequency, in which repeat sample locations must be identified, approximately a few times a year, lends itself to an SOP approach rather than detailed sampling location plan that would have a high likelihood of being out of date by the time the sampling location is needed.

An SOP approach is more efficient for both the PWS and the DEP as it would clearly identify the standards for selecting repeat sampling locations while allowing the PWS the flexibility to use to choose the most representative sites available at the point in time that the repeat samples are needed. The SOP would also identify the schedule for collecting routine samples and standards for sampling accessibility. Finally sampling site plans must be flexible and may need to be updated frequently. Therefore, we recommend that the sampling site plans be kept in electronic format to prevent the need to distribute multiple copies of the plan and create unnecessary waste. In addition, we recommend that the word "available" should remain in the regulation language regarding check sample locations, Section 109.701(a)(5).

Finally any necessary changes made to DWELR to make accommodations for this new rule should not impact existing three digit sample site IDs. Maintaining current sample site IDs is necessary for consistent recordkeeping and analyzing historical data.

#### **Alternate Repeat Sample Locations –Preamble Section I.**

As recommended by TAC, we concur that DEP should allow alternate repeat sample locations. Alternate repeat sample locations will allow for more representative repeat sampling plans than the 5 upstream/downstream requirement. As stated in TACs comments, the 5 upstream/downstream rule never had any scientific background and many PWS's have the ability to use technically valid approaches such as hydraulic modeling to identify the most representative sampling location based on real time operation of the system. These tools available to PWS would be able demonstrate that the alternate repeat monitoring location is representative the area of the distribution systems that led to the original coliform-positive sample. Suez Water does not recommend that the submittal of SOPs for alternate repeat monitoring be certified by a professional engineer or a certified operator as the PWS should have the ability to assign their own designee for these situations.

Suez Water proposes that a SOP should be used to identify the location of repeat samples as well as alternate repeat sample locations as needed. An SOP as allowed by the federal rule [40CFR

141.853(a)(5)(i)] will provide a sound framework for public water systems to comply with RTCR without dramatically increasing the time spent on developing sampling sites plans and administrative burden for maintaining these plans.

**Level 1 Assessment Triggers – Section 109.202(4)(iii)**

Per federal regulation 40 CFR Section 141.859 Coliform Treatment Technique Triggers and Assessment Requirements for Protection against Potential Fecal Contamination, these assessments have been developed in order to identify the possible presence of sanitary defects and defects in distribution system coliform monitoring practices. However, the proposed regulations 109.202(4)(iii) states that the Department may direct a system to conduct a Level 1 or Level 2 assessment if circumstances exist which may adversely affect drinking water quality. Although examinations of the circumstances surrounding other water quality issues are warranted, it could be confusing for suppliers and possibly regulators to use the same assessments for multiple situations not associated with this regulation.

**Public Notification of MCL Violation – Section 109.409(b)(1)**

As recommended by the TAC, we would prefer that the notification requirement to DEP regarding an E. coli positive result reflect the notification by the end of the day requirement in the federal rule. In addition, we would like the ability to use DEP's 24 hour emergency number to meet this notification requirement.

**Level 1 and Level Assessments – Section 109.705(b)(2)**

Suez Water would like to be able to submit level 1 and level 2 assessments to DEP electronically.

**Compliance Cost – Preamble Section F.**

As stated in preamble to this rule compliance cost for monitoring requirements are insignificant. However what has not been quantified is the PWS staff time required to implement and maintain the administratively burdensome sampling site plans.

Thank you for the opportunity to comment on this regulation that impacts all Pennsylvania water suppliers. Please see the attached summary of comments for distribution to the Board.

Sincerely,



Mary Neutz  
Water Quality Manager  
Mid Atlantic Division – Suez Water