



Columbia Water Company's comments to the Environmental Quality Board

Proposed Rulemaking  
[25 Pa. CODE Ch. 109]  
Safe Drinking Water; Revised Total Coliform Rule  
[45 Pa. B. 5943]

November 20, 2015

Summary Comments

1. The Columbia Water Company supports the Pa. Department of Environmental Protection's (PaDEP) actions to improve public health by adopting revisions to the Total Coliform Rule (TCR).
2. The Columbia Water Company believes the language in 109.202 (c) (4) (iii) allowing PaDEP to require a Level 1 or Level 2 assessment "... if circumstances exist which may adversely affect drinking water quality ..." is too broad and unnecessary. The federal rule meant for these assessments to be used as a tool to address the presence of Total Coliform and E. coli. The proposed language broadens the scope greatly and opens the door for assessments completely unrelated to Total Coliform and E. coli. If PaDEP is aware of other "circumstances" that will trigger an assessment then they should be enumerated in the regulation.
3. The Columbia Water Company believes the language in 109.409 requiring a Tier 2 Public Notice for failure to report a positive E. coli. *routine* sample within one hour as excessive and unnecessary. One of the driving forces behind revisions to the TCR was to eliminate unnecessarily alarming the public. We believe requiring a Tier 3 Public Notification instead of a Tier 2 Public Notification is consistent with the Federal RTCR reporting requirements.
4. The Columbia Water Company believes the language in 109.701 (a) (5) (D) and (G) requiring the identification of specific repeat monitoring sites and a description of the accessibility of the sample sites will be overly burdensome for water systems and provides no benefit to public health protection, and in fact may jeopardize public health protection. Water systems are dynamic by nature and the direction of flowing water changes constantly based upon water demands, tank levels and treatment methods/locations. Requiring water systems to identify the specific locations for check sample locations prevents water systems from using real time data to select the best locations for check samples based upon real-time conditions. Further, the long-term suitability of check sample locations is unpredictable especially in residential areas where there is no legal or practical way for water systems to monitor changes in premise plumbing, fixtures, maintenance or uses by changing residential populations.

**Columbia Water Company**

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220 Locust Street ■ P.O. Box 350 ■ Columbia, PA 17512  
Phone: 717-684-2188 ■ Fax: 717-684-4566