



The York Water Company
Public Comment for the Pennsylvania Department of Environmental Protection
Regarding Proposed Changes to Technical Guidance Document
(25 Pa. Code Chapter 109)
Lead and Copper – A Working Guide to the Lead and Copper Rule
Document Number 393-0300-001
December 20, 2018

Comments on Document Number 393-0300-001

- 1) Page 11, letter E: We understand that the definition of *source water* in this document actually refers to the Entry Point. This is not common knowledge. This guidance material will be used by both regulators and non-regulatory personnel and therefore, we suggest that the Department clarify that the term *source water* is, exclusively in context to the Lead and Copper Rule, referring to the Entry Point to the Distribution System and not what the term *source water* typically refers to; the raw, untreated water.
 - a. Pg. 40, Section C. Source Water Treatment Performance Requirements
 - b. Pg. 41, Section D: Source Water Monitoring
 - c. Et. al.

- 2) Page 42, Excursions: There appears to be a possible discontinuity between Chapter 109 and the guidance regarding excursions. The first sentence on page 42 states that excursions are determined at specific sampling points or for specific WQP parameters. This appears to suggest that counting of excursions will be what is used to determine compliance. The sentence immediately after helps clarify, but can be misinterpreted as contradictory to the first sentence on the page.

Two clarifying points in Chapter 109 is that “should an excursion for any parameter occur on more than any 9-days during the cycle”, indicating that one location or ten locations (for a single parameter) could be out of range for one day and that will count as one excursion day. Similarly, Chapter 109 also states that “An excursion occurs whenever the daily value for one or more of the water quality parameters is below the minimum or outside the range of values.” The word “An” refers to a single excursion day.

§ 109.1103.... “ (iii) *A system is out of compliance with the requirements of § 109.1102(b)(5) for a 6-month period if it has excursions for any Department specified water quality parameter on more than any 9 days during the 6-month monitoring period. An excursion occurs whenever the daily value for one or more of the water quality parameters is below the minimum value or outside the range of values designated by the Department. The Department has the discretion to delete results of sampling errors from this calculation. Daily values are calculated as follows:*”

“Whether an excursion has occurred on more than any 9 days during a 6-month monitoring period for any Department specified water quality parameter”

- 3) Page 44, A. 1. Twice on page 44: “Small and medium water systems can automatically qualify for reduced monitoring...” The phrase “automatically qualify” is confusing. Automatically refers to something that takes place without outside action and qualify refers to something requiring outside

action. Please clarify; does it mean that the system may be suitable, should the Department approve the move to reduced monitoring, or does it mean that the system will automatically move to reduced monitoring? Does page 45 clarify how a system moves to reduced monitoring? If so, then the word “automatically” seems confusing. If the system moves to reduced monitoring without any requests, letters, or forms, then automatically works here. Systems should either “qualify” or be “automatically” moved to reduced monitoring.

Thank you for your consideration, and should you have any questions, please do not hesitate to reach out to me at the below contact information.



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