

Trostle, Sharon F.

From: Gambatese.Jason@epamail.epa.gov
Sent: Monday, September 25, 2000 1:19 PM
To: RegComments@dep.state.pa.us
Cc: Wisniewski.Patti-Kay@epamail.epa.gov; wroblewski.john@dep.state.pa.us
Subject: Comments on Interim Enhanced Surface Water Treatment Rule and Disinfectants and Disinfection Byproducts Rule

Original: 2139



ieswtr_comments.wpd



dbp_comments.wpd



Word 6.0 Windows/
Mac



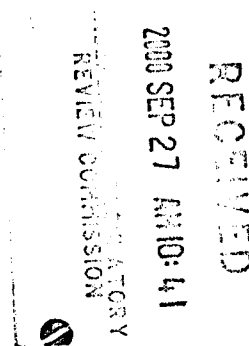
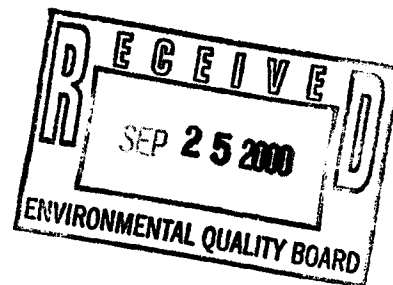
Word 6.0 Windows/
Mac

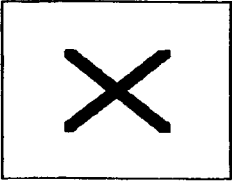
Attached are EPA Region 3's comments to PADEP's proposed Interim Enhanced Surface Water Treatment Rule (IESWTR) and Disinfectants and Disinfection Byproducts Rule (DBPR). In order to retain Primary Enforcement Authority (Primacy) for the state's Public Water System Supervision (PWSS) program, these rules must be approved by EPA. In order to facilitate this process, we have identified which of our comments must be addressed to receive approval. For the IESWTR, only comments number 1 and 2 must be addressed. For the DBPR, comments number 1, 2, 4, 5 and 7 must be addressed. If you have any questions, please contact me.

Jason Gambatese
US EPA (3WP22)
1650 Arch Street
Philadelphia, PA 19103
(215) 814-5759

I've attached the comments in both Wordperfect and MS Word format.

(See attached file: ieswtr_comments.wpd)(See attached file: dbp_comments.wpd)
(See attached file: ieswtr_comments.doc)(See attached file: dbp_comments.doc)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Interim Enhanced Surface Water Treatment Rule

1. §109.701(e) Reporting and Recordkeeping

It should be noted that systems must maintain individual filter monitoring data for at least 3 years and they must report that they have conducted individual filter monitoring within 10 days after the end of each month that the system serves water to the public.

2. §109.714(3) Filter Profile, filter self-assessment and CPEs

It should be noted that systems have 90 days to have the CPE completed.

3. §141.173(a)(3) of EPA regulation indicate that systems that use lime softening may acidify representative samples prior to analysis (for filtered water turbidity) using a protocol approved by the state. This was not included in PADEP's regulations.

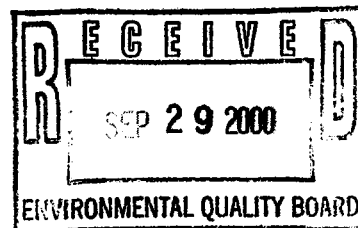


The York Water Company

September 26, 2000

Original: 2139

Environmental Quality Board
P O Box 8477
Harrisburg Pa 17105



Gentlemen:

Re: Comments on the monitoring requirements under the proposed IESWTR

Referring to Section 109.301 (1)(iv), the proposed rule states "...and record the results every 15 minutes."

Will existing continuous turbidity recording satisfy this requirement?

Would the addition of "...at least every 15 minutes"... clarify that continuously recorded data will satisfy this need without changing the requirements under the Federal Act? If an individual filter exceeded a turbidity level as specified under Section 109.701 (e)(i), the 15 minute reporting data could be retrieved as necessary from the continuous data record. This could eliminate an additional data management system which might serve no other purpose in an optimized plant.

Respectfully yours,

John S. Poklembo
Filter Plant Superintendent

IRRC

From: pzielins@pawc.com
Sent: Friday, September 29, 2000 11:27 PM
To: irrc@irrc.state.pa.us
Cc: pdiskin@pawc.com
Subject: Comments to Proposed D/DBP Rule

Mr. Smith: Original: 2139

At the request of Paul Diskin of our company, I am attaching our comments to the Proposed D/DBP and IESWTR rules proposed by DEP on September 2, 2000.

----- Forwarded by Paul A Zielinski/HERSHY/PAWC/AWWSC
on
09/29/2000 11:12 PM -----

Paul A Zielinski
09/29/2000 11:19 PM

To: RegComments@dep.state.pa.us, Gordon.jeff@dep.state.pa.us,
marrocco.fred@dep.state.pa.us
cc:

Subject: Comments to Proposed D/DBP Rule

Pennsylvania-American Water Company
800 West Hersheypark Drive
Hershey, Pa. 17033

Paul A. Zielinski
Fax: 717-531-3314
Director ? Water Quality
Telephone: 717-531-3308 Email: pzielins@pawc.com

2000 September 29,

For electronic submission to RegComments@dep.state.pa.us

I have reviewed the proposed regulations for the D/DBP rule and the Interim Enhanced Surface Water Treatment Rules published in the PA BULLETIN on September 2, 2000 and wish to offer the following comments on behalf of Pennsylvania-American Water Company.

Under section 109.202(g)(2)(ii)(F) on page 4602, an exemption from the required TOC monitoring and subsequent compliance with the TOC reduction requirements can be met "IF THE SYSTEM'S FINISHED WATER SUVA, MEASURED MONTHLY IN ACCORDANCE WITH SUBCHAPTER C, IS LESS THAN OR EQUAL TO 2.0 L/mg-m, CALCULATED QUARTERLY AS A RUNNING ANNUAL AVERAGE. " The Department should define what is termed FINISHED WATER for compliance purposes. Finished water can be taken to mean combined filter effluent prior to any

post chemical feeds, combined filter effluent after post chemical feeds, or at the entry point to the distribution system. Clarification is needed on the interpretation of this requirement.

On page 4605 of the proposed regulations, under section 109.301(12)(iv)(A), "SYSTEMS SHALL TAKE MONTHLY SAMPLES OF THE SOURCE WATER ALKALINITY, THE SOURCE WATER TOC AND THE COMBINED FILTER TOC FOR EACH TREATMENT PLANT THAT UTILIZES CONVENTIONAL FILTRATION". If a plant does not have a combined filter effluent line, it is unsure where the second paired sample should be taken for the determination of mandatory TOC reductions required by the Rule. If a combined effluent line is present, the facility is allowed additional credit for TOC removal through filtration, which, in some facilities, can be substantial versus the TOC present in the filter applied water. Bacterial action in filters, most noticeably in granular activated carbon filters, can naturally biodegrade some components of TOC and further enhance reductions through the bed. It is unfair to penalize a plant which does not have a combined filter effluent line when dealing with these regulations. No commonly used post treatment chemicals are known to contribute TOC to finished drinking water. I propose that the Department consider two options for the sample; one, to allow filter effluent compositing for plants with low numbers of filters, and two, allow plants to collect samples from the entry point to the distribution system in plants where no combined filter effluent line is present and a large number of filters is present. The results of these samples can then be used for the determination of compliance with the TOC reduction requirements on the M/DBP rule by comparing them to source water values. It is also unsure as to how to calculate the percent TOC reduction if the second paired sample is higher than the source water sample. This has happened periodically in our preliminary testing, and it is not clear how to evaluate this result. If the paired sample result is higher in TOC than the source water, I would recommend that a reduction of 0% be used for the month versus the actual negative percentage removal achieved by actual calculation.

I thank you for the opportunity to comment on these regulations. Please contact me by phone or by email if you have any questions.

Zielinski

Water Quality

Paul A.

Director -