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

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INDEPENDENT REGULATORY  
September 27, 2007

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA17105-8477

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SEP 28 2007

*Express Mail*  
Environmental Quality Board  
Rachael Carson State Office Building  
16<sup>th</sup> Floor  
400 Market Street  
Harrisburg, PA 17101-2301

ENVIRONMENTAL QUALITY BOARD

Re: 25 PA CODE CH 109  
Safe Drinking Water - General Update

To whom it may concern:

The United State Environmental Protection Agency, Region III, submits the following for consideration regarding the Safe Drinking Water – General Update. Specific word or phrase additions and edits are in bold type; specific deletions are in brackets or have strike-outs. The comments are as follows:

*Phase II/V*

- Section 109.301(7)(iii)(C)(III) does not include asbestos regarding confirmation sample provisions listed in 40 CFR Section 141.23(f)(1). Therefore, similar provisions need to be added for asbestos under 109.301(7)(i).
- Section 109.301(7)(iii)(C)(III) does not include nitrate and nitrite regarding confirmation sample provisions listed in 40 CFR Section 141.23(f)(3). Therefore, similar provisions need to be added for nitrate and nitrite under 109.301(7)(ii).
- Section 109.301(5)(i) Vinyl chloride. **Quarterly** monitoring for compliance with the MCL for vinyl chloride .....
- Section 109.301(5)(i) PA needs to specify a monitoring requirement for surface water systems if one or more TTHMs are detected.
- Section 109.301(5)(viii) Waivers. **Monitoring waivers based on the initial monitoring results are not allowed.**
- Section 109.301(5)(viii) (A) Use Waivers...



- Section 109.301(5)(viii) **(D) Susceptibility Waivers are not allowed.**


- Section 109.301(7)(iii)(C)(II) .....**reliably and consistently below** the MCLs, the required monitoring for each IOC [**less than**] **below** the MCL is reduced to the frequencies stated in clause (A).

*Lead and Copper*

- Section 109.1102(a)(4)(iv) To ensure equivalency the citation should be revised. For water systems **servng fewer than 100 people** that collect 5 samples per monitoring period, the 90<sup>th</sup> percentile ...

If you have questions or comments please contact me at (215) 814-5711.

Sincerely,



Richard A Rogers, Chief  
Drinking Water Branch

