

#2637

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From: Claudia Watt [cwatt@warwicktownship.org]
Sent: Friday, October 26, 2007 11:22 AM
To: regcomments@state.pa.us; irrc@irrc.state.pa.us; peteslack@municipalauthorities.org;
 case@municipalauthorities.org
Cc: 'Daniel Zimmerman'
Subject: Regulation ID #7 - 407 (#2637) Proposed Chapter 109 Safe Drinking Water Public Notice Regulations

INDEPENDENT REGULATORY
BOARD COMMISSION

I am writing regarding the above referenced proposed regulation and offer the following comments:

1. For systems that have individual entry points that can be isolated from each other, each entry point should be treated as a "system" to avoid unnecessary notifications.
2. Not all breaks would create a negative pressure, for small systems having one or two people out could constitute a "staff shortage". It should be up to the system to determine when an emergency exists.
3. For one hour notifications to DEP – what is the after-hours number to call and is there a required response time for DEP to get back to the system?
4. There are several issues regarding the dial-up system which we believe make it ineffective as a tool for one hour notification:
 1. More and more people are moving to cell phones only. They are reluctant to use their minutes on this type of call – especially if it will not affect their area.
 2. Customers who have unlisted phone numbers and who refuse to give them out cannot be reached.
 3. Many people already have the solicitation blocker which requires that you press 1 #. Is a dial up system able to do this?
 4. Many people work during the day and the message will likely go to an answering machine, where they may or may not listen to the message.
 5. The cost of a dial up system would be passed on to consumers and, if required, they should be made aware of the cost and that it is a requirement of DEP.
5. In addition to the notification message, the supplier is required to issue a clear message. Too many messages, of any type, will desensitize the recipient, especially if they receive messages about problems that will not affect them.
6. Constant notifications will undermine people's confidence in the competence of the system. It is important to notify people whenever necessary but not to overwhelm them with unnecessary messages.
7. Our water meters are read by touch pad. On average it takes one minute per household. Door to door notifications would be the same which would indicate that the comparison of costs is not applicable to all systems.
8. Notifications through the media (radio and television) and door-to-door would be the most effective method of one hour notification for real water emergencies. It may be possible to enlist the assistance of volunteer fire companies and/or the police for these efforts in a genuine emergency.
9. A general public notice through a notice enclosed with a billing or municipal newsletter could alert residents that, in the event of a power outage, water (and sewer) pumps could be affected if the system does not employ the use of generators.

Claudia A. Watt
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 Warwick Township Municipal Authority