



2637

NORTH WALES WATER AUTHORITY

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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NOV 20 2007

ENVIRONMENTAL QUALITY BOARD

November 16, 2007

Environmental Quality Board
16th Floor
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101-2301

RE: Proposed Rulemaking: Public Notice on Drinking Water Systems (Public Notification Revisions to Title 25, PA Code Chapter 109, Safe Drinking Water) Pennsylvania Department of Environmental Protection ID 7-407 (#2637)

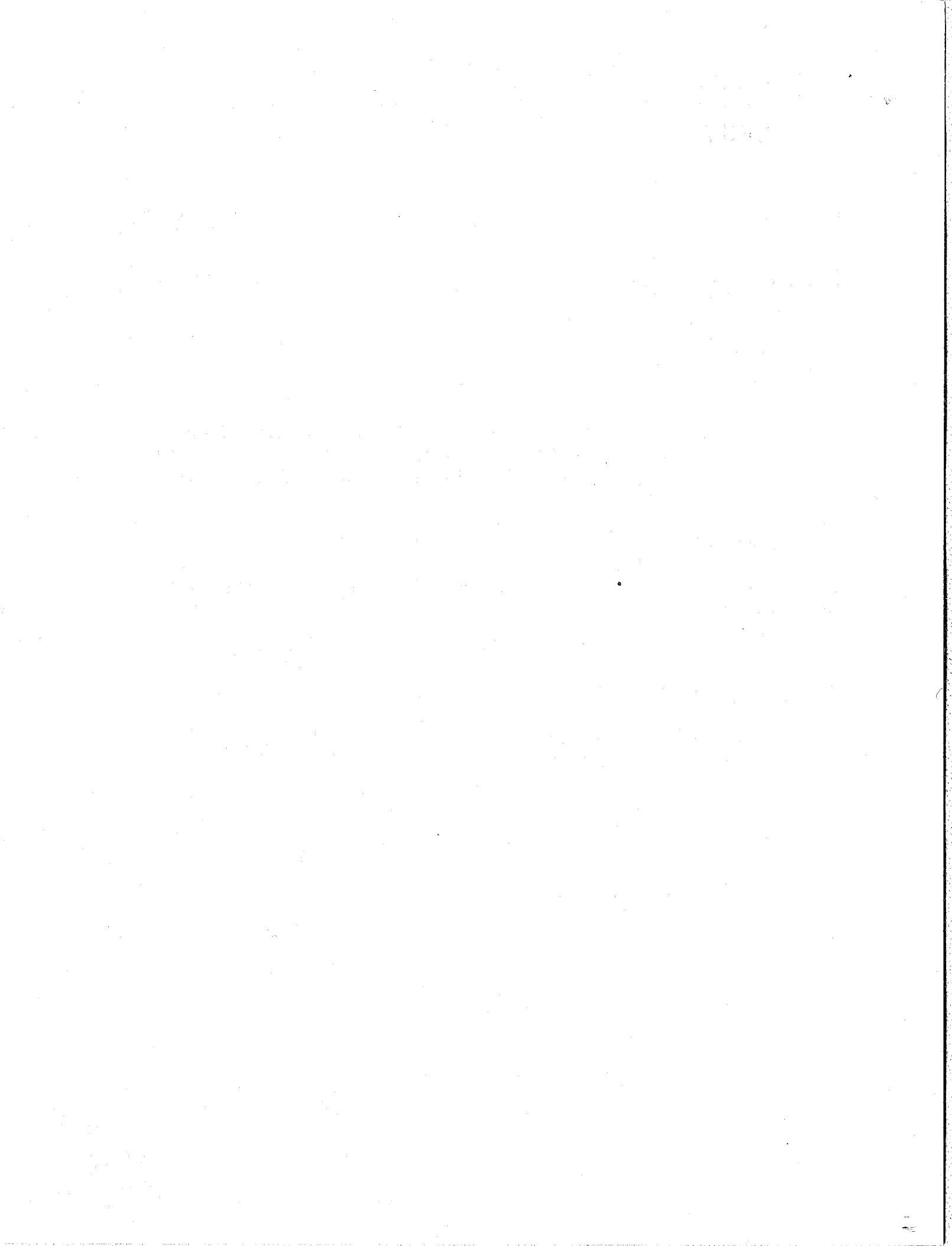
To Whom It May Concern,


Enclosed for filing please find comments from the North Wales Water Authority regarding the subject referenced above.

Sincerely,

George Schwartz
Executive Director







**Before the
Pennsylvania Department of Environmental Protection**

In Reference to Proposed Rulemaking:
Public Notice on Drinking Water Systems
(Public Notification Revisions to Title 25,
PA Code 109, Safe Drinking Water)

Pennsylvania Department of Environmental
Protection ID: 7-407 (#2637)

**Comments of the
North Wales Water Authority**

The North Wales Water Authority was incorporated in 1951 by the government of the Borough of North Wales under the Pennsylvania Municipal Authorities Act of 1945. The Authority is governed by a five member board of directors appointed by the borough council of North Wales. The board members are customers of the system and serve without compensation. The purpose of the formation of the North Wales Water Authority was to acquire and operate the privately held North Wales Water Company which, at the time, served 1,200 customers.

Due to the continuing need for access to public water supplies in the surrounding area, the North Wales Water Authority extended its service lines into the neighboring municipalities of Upper Gwynedd and Lower Gwynedd Townships. The added advantage of this expansion was to acquire a larger service area and provide the Authority with an ability to develop additional groundwater sources for its customers' ever increasing demand.

The local area experienced a drought of record in 1964, which afforded the Authority an opportunity to expand into Montgomery Township. Later, in the late 1960s, the Authority acquired the assets of the Blue Bell Water Company (a privately held company) and expanded its service into Whitpain Township. In 1979, the Authority acquired the assets of the Upper Dublin and Delaware Valley Industrial Water Companies (also privately owned) and expanded into Upper Dublin Township and the Delaware Valley Industrial Park. Additional acquisitions in the 1980s expanded the Authority's service area into New Britain Township and Bucks County.

The Authority offers several unique advantages over private or investor-owned entities in its ability to deliver superior quality drinking water. The Authority is nonprofit; therefore, 100% of all revenues remain within the Authority for system improvement and expansion. There is no outside stockholder cost, nor can funds be used for other municipal services.

The Authority was fortunate to have leadership through the years with wisdom and foresight to anticipate its customers' future requirements. The ever-growing population of the Authority's service area increased the demand for high-quality drinking water. The Authority also recognized the potential loss of a number of groundwater sources in the upcoming years and the need to continue to provide a high quality, reliable water supply to meet the current and

future demands of its customers. This prompted the Authority to combine its resources and form a unique public-private partnership that resulted in the Point Pleasant Diversion Project on the Delaware River and, in turn, the state-of-the-art Forest Park Water Treatment Plant.

Forest Park is one of only a very few water treatment facilities in the United States that incorporates both pre- and post ozonation, advanced membrane filtration and biologically active granular-activated carbon contactors to produce superior quality drinking water that greatly exceeds all current and future state and federal requirements. Therefore, our customers enjoy with confidence the healthy, refreshing water flowing through their taps. Forest Park has created an opportunity for the Authority to become a regional supplier of superior quality water. In addition to directly serving seven municipalities, the Authority now provides bulk water sales to numerous communities in Bucks and Montgomery counties.

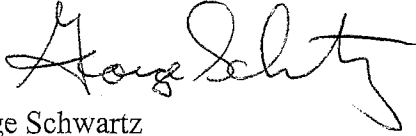
It is with this in mind that the North Wales Water Authority submits the following comments:

- The Authority shares the concerns of the entire water industry in Pennsylvania regarding the costs and ongoing system maintenance associated with implementing an "opt-in" notification system so that customers can request to be contacted by method of choice (telephone, email, pager, cell phone, text message, or other personal device) in the event of a situation. It is also important to note that even these sophisticated systems do not guarantee 100 percent notification.
- Questions have arisen regarding the one-hour reporting requirements. When does the one-hour time frame officially begin? When the operator receives an alarm? When a quick assessment of the situation is made? When an incident is verified?
- The Authority has concerns regarding how the Department intends to handle main breaks with the regard to situations requiring one-hour reporting and the issuance of a Boil Water Notice. We believe this treats every main break as a Tier 1 Violation. Water industry data has shown that the majority of main breaks do not allow contaminants to enter the distribution system by either back-flow, back-pressure or back-siphonage. Further, we believe that this requirement will generate thousands of unnecessary calls to the DEP, which is already understaffed in many operational areas. The issuance of precautionary Boil Water Notices for every main break will not only diminish consumer confidence, but render the public less receptive to such notices.
- The issuance of thousands of precautionary Boil Water Notices will work to enhance the marketing opportunities of the bottled water and point-of-use water treatment industries who realize great joy from bashing public drinking water systems on a routine basis.
- The Department should consider inclusion of a predetermined compliance period for all systems required to implement automatic dialing systems. This would allow these systems time to work out budget deficiencies, process authorizations of needed equipment or negotiate contracts with suppliers and vendors.

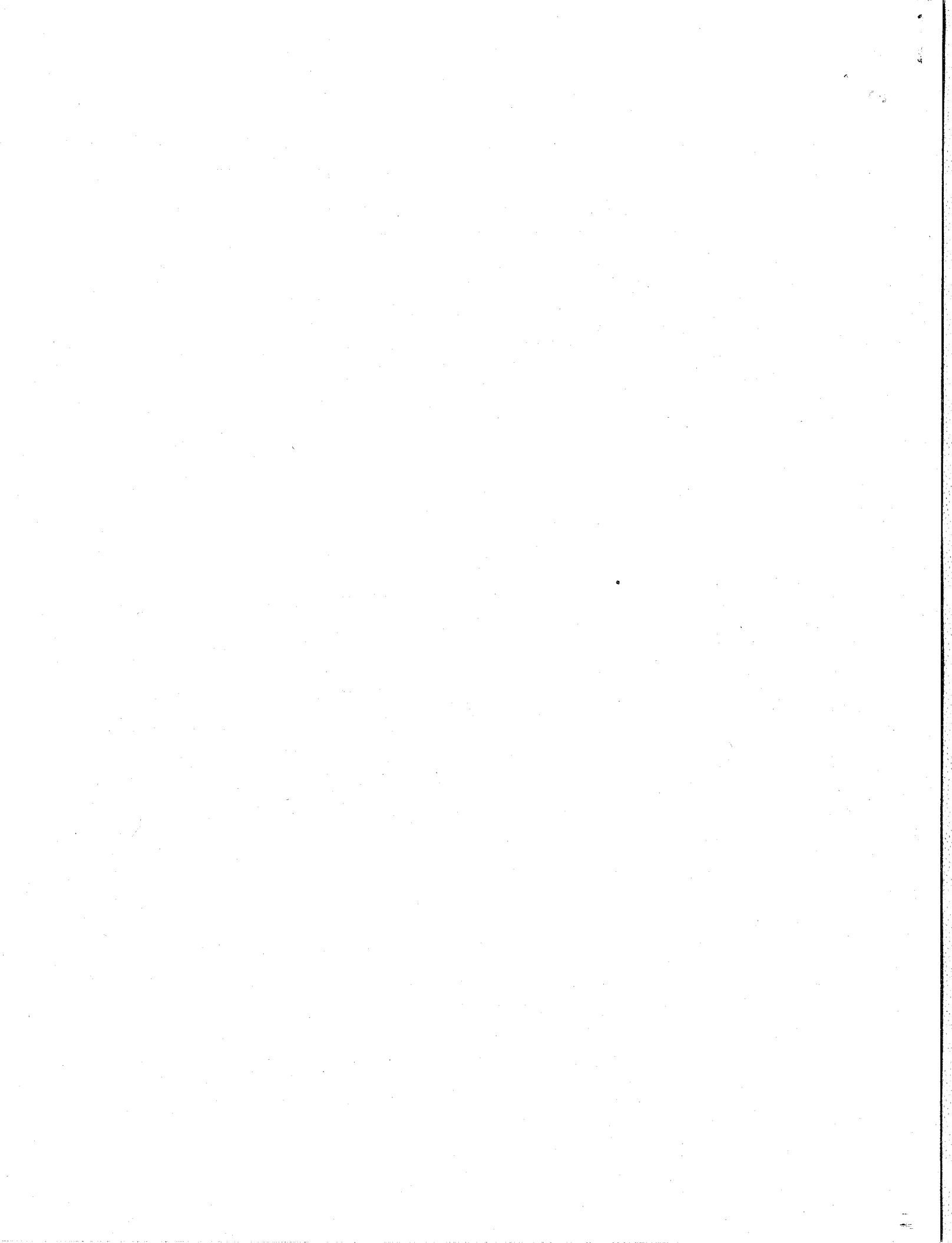
This proposed rulemaking presents an opportunity for the Department to work directly with the water suppliers of the Commonwealth for the mutual benefit of all drinking water consumers.

The Authority appreciates the opportunity to present comments on this Proposed Rulemaking and requests that the Department consider its comments on these issues.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "George Schwartz".

George Schwartz
Executive Director





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Summary of Comments on Public Notice Proposed Rulemaking

Pennsylvania Department of Environmental Protection ID: 7-407 (#2637)

Public Notification

The Authority shares the concerns of the entire water industry in Pennsylvania regarding the costs and ongoing system maintenance associated with implementing an "opt-in" notification system so that customers can request to be contacted by method of choice (telephone, email, pager, cell phone, text message, or other personal device) in the event of a situation. It is also important to note that even these sophisticated systems do not guarantee 100 percent notification.

System Management Responsibilities

Questions have arisen regarding the one-hour reporting requirements. When does the one-hour time frame officially begin? When the operator receives an alarm? When a quick assessment of the situation is made? When an incident is verified?

Main Breaks

The Authority has concerns regarding how the Department intends to handle main breaks with the regard to situations requiring one-hour reporting and the issuance of a Boil Water Notice. We believe this treats every main break as a Tier 1 Violation. Water industry data has shown that the majority of main breaks do not allow contaminants to enter the distribution system by either back-flow, back-pressure or back-siphonage. Further, we believe that this requirement will generate thousands of unnecessary calls to the DEP, which is already understaffed in many operational areas. The issuance of precautionary Boil Water Notices for every main break will not only diminish consumer confidence, but render the public less receptive to such notices.

The issuance of thousands of precautionary Boil Water Notices will work to enhance the marketing opportunities of the bottled water and point-of-use water treatment industries who realize great joy from bashing public drinking water systems on a routine basis.

Compliance Period

The Department should consider inclusion of a predetermined compliance period for all systems required to implement automatic dialing systems. This would allow these systems time to work out budget deficiencies, process authorizations of needed equipment or negotiate contracts with suppliers and vendors.



