

THE MUNICIPAL AUTHORITY OF THE BOROUGH OF WEST VIEW

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210 PERRY HIGHWAY
WEST VIEW
PITTSBURGH, PENNSYLVANIA 15229

- Administrative
(412) 931-3292
- Customer Service
(412) 931-3500
(412) 364-1257

November 19, 2007

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Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

ENVIRONMENTAL QUALITY BOARD

**RE: Proposed Rulemaking, PA Bulletin Doc No. 07-1754
Safe Drinking Water – Public Notice Revisions (Title 25, PA Code Chapter 109)**

Environmental Quality Board:

I would like to take this opportunity to extend my thanks and appreciation for affording me the opportunity to provide comments with regards to "Proposed Rulemaking, PA Bulletin Doc No. 07-1754 Safe Drinking Water – Public Notice Revisions (Title 25, PA Code Chapter 109)". As per Section J, our comments in a "one-page summary will be provided to each member of the Environmental Quality Board in their agenda packet distributed prior to the meeting which the final regulation will be considered".

The Municipal Authority of the Borough of West View serves in excess of 200,000 consumers in the Northern Suburbs in the City of Pittsburgh. We currently service 31 communities in three counties, Allegheny, Butler and Beaver. Our authority as well as most other major utilities within the Commonwealth have been both prudent and pragmatic with regards to protecting the health and welfare of our consumers.

Respectfully,

Joseph A. Dinkel
Assistant Executive Director/
Plant Manager

Cc: Ms. Deborah McDonald, PaDEP
Mr. Geoffrey M. Butia, Allegheny County Health Dept.
Ms. Sharon Bruno, Director of Administration

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Comments to Proposed Rulemaking, PA Bulletin Doc No. 07-1754
Safe Drinking Water – Public Notice Revisions (Title 25, PA Code Chapter 109)

The Municipal Authority of the Borough of West View is saddened by the thought that as a result of what appears to be "A Knee Jerk Reaction" to an isolated situation, that is without precedent, that an entire industry should be called to task.

In Allegheny County, for several decades, we have been functioning under a document known as a "Drained System Protocol". This is a comprehensive document that relates to the required reporting of low pressure, main breaks, water shortages and required notifications. This document developed by the Allegheny County Health Department has served both industry and the regulatory community very well indeed.

Water purveyors can better serve the public through proactive programs that will diminish the requirement for hi-tech public notification systems that lack demonstrated reliability. The Commonwealth and DEP have been proactive by mandating Operator Certification and a closely allied requirement for continuing education units. Highly developed and professionally staffed backflow prevention programs as well as cross-connection control programs limit the potential for system contamination as a result of main breaks, fire fighting activities and pumping operations.

In most parts of Europe a chlorine residual is not required, with little or no consequence. As an additional barrier, utilities within the Commonwealth are required to maintain an adequate chlorine residual, which protects the distribution system against inadvertent contamination, which can possibly occur as a result of operations within the distribution system. When utilities adopt and employ the standards developed by the American Water Works Association (AWWA) the potential for wide scale system contamination is practically eliminated.

This proposed rulemaking would mandate that water purveyors throughout the Commonwealth procure and implement automated calling systems, which have not demonstrated a high degree of reliability, even the 911 systems, which are employed throughout the Commonwealth, lack reliability. Implementation of an automated notification system can unfortunately lead to general apathy among consumers who will tend to ignore continued notifications.

I contend that the implementation of protocols similar to those developed by the Allegheny County Health Department in conjunction with the cooperation of water purveyors could prove to be a very effective tool. Chemical overdoses are very infrequent at best. The fluoride overdose which has been central to this issue could be arrested by changing the feed location to the head of the plant where adequate detention time could yield appropriate response time.

The other side of the equation is training. It is essential that fire departments receive individualized training for the specific areas in which they operate and enlightened, well developed system flushing programs, implemented by well trained certified utility employees, along with enforcement of existing regulations would be far more effective and protect the public interest to a much higher degree than the implementation of expensive automated warning systems, which might yield questionable results.

In conclusion, I implore the Board to think long and hard before mandating that all utilities employ an expensive notification system with significant manpower and technology requirements. There are better alternatives.