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November 5, 2015

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

Dear Board:

My name is Randy High. I am appearing on behalf of Pure-Test Laboratory, Myerstown, PA. Pure-Test is a PA DEP certified lab, performing analysis of potable and non-potable water. Pure-Test is also certified by the PA Department of Agriculture, as well as the Maryland Department of the Environment. Pure-Test performs analytical services for nearly 500 Public Water Suppliers (PWS) in PA (more than 5% of PA systems). I serve as the Pure-Test business manager, which I have done more than 20 years; as manager, I oversee the water sample collection schedule.

I am here to comment on PROPOSED RULEMAKING 25 PA. CODE CH. 109 Safe Drinking Water; Revised Total Coliform Rule [45 Pa.B. 5943] [Saturday, October 3, 2015].

Pure-Test specifically objects to:

(1) Interim Final FORM 2: Total Coliform Sample Siting Plan Form Instructions 3930-FM-BSDW0525 Rev. 10/2015 (Page 3) Part 2: Sampling Information D. Sample Interval Description: *Indicate the week of the month that sampling will occur.*

(2) Interim Final FORM 3: Total Coliform Sample Siting Plan Form Instructions 3930-FM-BSDW0526 Rev. 10/2015 (Page 3) Part 3: Sampling Information D. Sample Interval Description: *These systems should indicate the week of the month in which that day will fall.*

Under the RTCR and the proposed PA rule, Pure-Test will collect samples from more than 400 PWS each month. Forcing labs to collect samples a specific week of each month creates difficult logistics. Pure-Test collects samples in 25 PA counties, including rural areas such as Schuylkill, Perry, Huntingdon, and Somerset. To keep costs low for our customers, Pure-Test tries to group sample collections geographically. The proposal fails to recognize that a given PWS may be inaccessible during the week the siting plan requires a sample collection, due to system maintenance, weather events, or limited access PWS business days or hours. 'PROPOSED RULEMAKING F. Benefits, Costs and Compliance' is not realistic, especially if a lab must go to a rural area a specific week regardless of cost effectiveness. Pure-Test's current standard sample pickup charge is \$12 per PWS, and Total Coliform/E. Coli analysis is \$26. A Transient Noncommunity Water System will see an annual increase of \$304 (at standard rates) from Pure-Test under the RTCR, not \$229.31 as listed in your proposal. This is without considering surcharges for a special trip to accommodate the specific week sampling requirement.

In addition, if the goal of the proposed rule is to bring about 'greater public health protection', the requirement for collecting samples a specific week of the month inhibits that goal; if a PWS knows which week samples will be collected, they may be more likely to make sure that any treatment on their system is working properly during that sampling window, rather than properly maintaining their system throughout the month pending a random sample collection. If the proposal seeks to spread out sample collection from a given system, perhaps it should simply specify that sample collections should be separated by at least 4 days.

Sincerely,

Randy High