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## Kathy Cooper

**From:** ecomment@pa.gov  
**Sent:** Tuesday, December 01, 2015 4:01 PM  
**To:** Environment-Committee@pasenate.com; IRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; gvitali@pahouse.net; regcomments@pa.gov; apankake@pasen.gov  
**Cc:** ra-epmsdevelopment@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: Revised Total Coliform Rule



### Re: eComment System

**The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Revised Total Coliform Rule.**

#### Commenter Information:

Diane Kisner  
Mahaffey Laboratory, LTD ([dkisner@mahaffeylaboratory.com](mailto:dkisner@mahaffeylaboratory.com))  
551 State Street  
Curwensville, PA 16833 US

#### Comments entered:

December 1, 2015

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

#### Dear Environmental Quality Board:

This letter is to provide comments in regards to the proposed rulemaking for 25 PA Code Ch. 109 for Safe Drinking Water; Revised Total Coliform Rule. Mahaffey Laboratory provides coliform analysis for approximately thirty five different drinking water facilities.

Mahaffey Laboratory would like to express concern about the apparent discrepancy between the language in § 109.303.(a)(2) Sampling requirements. which states "Samples...shall be taken at regular intervals throughout the monitoring period" and the sample siting plans requiring that a specific week of the month be designated for sample collection. The intent of this wording appears to ensure that samples are not taken inconsistently, for example, at the end of one month and the beginning of the next. However, the sample siting plans appear to be restricting sampling events to a particular week each month which could become cumbersome for our laboratory due to staff availability, weather, and holidays. The laboratory may provide advice/guidance to Community Water Supply (CWS) clients but will most likely not fill out the sample siting plans for most of our clients. We schedule each of our drinking water sample collection events to coincide with other sampling in the same area. If CWS clients write their sample siting plans so that collection of their sample cannot be coordinated with other sample

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events, then the CWS may incur addition costs in the amount of \$45/hour. This additional cost could become financially burdensome to water suppliers and in turn the general public.

It is not possible or convenient to list all of the things that could potentially prevent samples from being collected and analyzed within a specified time frame, however the sample date +/- 3 days that has been in effect for Stage 2 Disinfection By-Products Rule has proven to be quite challenging and this is reminiscent of those sampling plans. Mahaffey Laboratory would suggest that, for example, it is stated, monthly samples be collected at a minimum of one week apart rather than during a specific week each month.

Respectfully,  
Mahaffey Laboratory, LTD.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Patrick McDonnell

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PA Department of Environmental Protection  
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