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WILLIAMSPORT MUNICIPAL WATER AUTHORITY
253 WEST FOURTH STREET
WILLIAMSPORT, PA 17701
(570) 323-6148

April 7, 2016

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

**RE: Proposed Disinfection Requirements Rule
Public Comments**

Dear Environmental Quality Board:

The Williamsport Municipal Water Authority (WMWA) is submitting the following comments on the Proposed Disinfection Requirements Rule published in the Pennsylvania Bulletin on February 20, 2016:

- The WMWA supports the recommendations made by the TAC Board on July 15, 2015 including a proposed distribution minimum residual requirement of 0.1 mg/L. In addition, the following TAC Board recommendations are also supported:
 - If 95% of the distribution system residuals results are greater than the suggested minimum of 0.1 mg/L then no further action would be required. The current proposal requires a Tier 2 notification for all results not meeting the proposed 0.2 mg/L minimum limitation. The increase in Tier 2 violation notices will result in undermining of consumer confidence.
 - If distribution system residuals are less than the suggested minimum of 0.1 mg/L, then retaining the current alternative HPC test is suggested to demonstrate that bacterial contamination is not a problem.
 - If two consecutive results at the same sample location fail to meet the suggested minimum of 0.1 mg/L and the HPC is greater than 500 CFU both times, then a Tier 2 notice could be issued to the customers regardless of the overall percentage of passing results.
- The WMWA is concerned about the unintended consequences that the higher disinfection residuals may have on other required regulations including:
 - lead and copper levels in the distribution system.
 - TTHM and other disinfection by-product formation, and
 - chlorine taste and odor complaints from customers.

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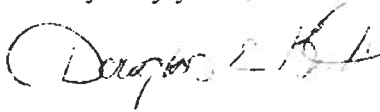
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- The WMWA requests a twenty-four month period for implementation in order that water suppliers can engineer, permit, and construct needed booster chlorination or flushing systems that may be necessary to guarantee compliance as well as evaluate other unintended consequences described above.
- In order not to discourage water suppliers from using chlorine residual as a tool to evaluate customer complaints, disinfection residuals taken in response to customer complaints or water main breaks and repairs should not be used in determining compliance to the Disinfectants Requirements Rule. Sampling as part of a customer complaint investigation is at times done under less than ideal sanitary conditions or conducted as part of an investigation when the homeowner's plumbing is of questionable integrity. Sampling for a disinfection residual in response to a main break or repair is not representative of normal operating conditions as there can be lingering air or turbidity in the line. The WMWA suggests that disinfection residual results used for compliance purposes be limited to those paired with the coliform samples collected at the locations defined in the Revised Total Coliform Rule Sample Siting Plan similar to other programs.

Thank you for accepting our comments on this proposed regulation.

Very truly yours,



Douglas E. Keith
Executive Director