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Western Berks Water Authority • Phone: 610.678.4400 • www.wbwa.org

Wednesday, April 13, 2016

To Whom it May Concern,

My comments are written to represent Western Berks Water Authority and the small consecutive systems that it serves. Western Berks Water Authority sells water in bulk to several small to medium size PWSs in Western Berks County, and serves in many different capacities for them. Today I am writing as an advocate for these systems and my own to discuss the Proposed Disinfection Requirements rule with respect to its position on Heterotrophic Plate Count (HPC) monitoring.

Throughout the course of the chlorine residual and HPC debate the comment was made that "the threshold limit of <500 cfu/ml was of an unknown origin." Actually, the US EPA set this level in 1984 by stating:

Values of less than 100 cfu/ml were considered achievable for all systems. Values from 100 to 500 cfu/ml were anticipated during seasonal increases or at certain locations in the system (dead ends, low residuals) and would suggest a need for flushing. Values greater than 500 cfu/ml would suggest poor microbial quality.

Western Berks Water Authority has been recognized by the State as a water system that consistently uses HPC in its routine monitoring. WBWA uses HPC as a tool to:

- Trend the efficiency of the treatment plant and the filtration process at our entry point
- Trend the efficiency of the disinfection process at the treatment plant and throughout our transmission system
- Trend bacteria levels in areas with an increased contamination potential; and to
- Trend the biostability of our transmission systems and storage tanks

Removing the use of HPC as an indicator of distribution health is effectively removing a tool from the operator's tool box. First, like the State, many systems have budgetary constraints and will not pay for a test that is not mandated to be run. Many operators will be forced to identify problem areas without having access to the information that can be gleaned from using HPC.

Second, I believe that removing the test from the regulation is in direct conflict with the spirit of the RTCR where operators are required to "find and fix" potential areas of concern. HPC is a tool that can alert operator's to a problem before sample locations actually present with a positive Total Coliform or E. coli sample.

Third, both the EPA and European Union have acknowledged the operational importance of using HPC colony counts to establish the overall health of a public water systems distribution system health, and as a pre-cursor with a sudden change to indicate that there is a potential defect or problem that requires investigation.

Forth, the Small Water Systems Technical Assistance Center (TAC) Board recommended (by a vote of 12 to 0 with 1 abstention) that the Board retain the requirement for HPC monitoring.

Additionally, I would like to comment on how regulations are used by many water systems. Most of the state is covered with PWSs that are represented by one certified operator, whom is most likely not a microbiologist. Small system operators are required to wear many hats and because of that are good at many things, but are not experts. These operators rely on the fact sheets on regulations to determine how their system stacks up and the tools that are available to them within the regulation. By removing HPC from the regulation, the State is effectively erasing the test as a viable tool to operations staff who will never even know of its existence.

Western Berks Water Authority views the integration of two regulations (RTCR and Proposed Revisions to Chapter 109) as a "perfect storm" for the consecutive systems that we serve. RTCR has required that systems indentify and relocate sample locations to areas in distribution where there are low flows, dead ends, or high water age. The proposed change to disinfection limit is a ten time increase in residual. Following the spirit of both regulations we will have systems sampling in self-designated "weak spots" (with no historical information) in their distribution systems with the added constraint that the disinfection level must be ten times higher with no alternative means of identifying the biological activity at that location.

Thank you for your time.

Respectfully,



Matthew R. Walborn  
Director of Operations  
Western Berks Water Authority