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Kathy Cooper

From: ecomment@pa.gov
Sent: Monday, April 18, 2016 12:36 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: Disinfection Requirements Rule



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Disinfection Requirements Rule.

Commenter Information:

Douglas Brown
Steelton Borough Authority (dbrown@steeltonpa.com)
123 North Front Street
Steelton, PA 17113 US

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Comments entered:

The Board has requested comments as to whether or not other provisions of the Disinfection Requirements rulemaking should be deferred. We feel strongly that the requirement to increase chlorine residual concentrations throughout the water distribution system to 0.2 mg/l should be deferred to allow system owners adequate time to plan and budget for the necessary operational changes and/or capital improvements necessary to meet these requirements. As you know the proposed rule would increase the required concentration by a factor of 10 over the current regulations. Owners will have many variables to consider before moving forward with the most feasible alternatives to address the issue including significant capital upgrades. We believe that system owners should be given an adequate amount of time to submit a plan of action including operational improvements and capital improvements with an implementation schedule provided based on the actual improvements necessary.

The Board has requested comments on the anticipated costs to comply with the proposed rule. The proposed rule cites estimates of \$2,000 each for automatic flushers and \$250,000 each for booster chlorination stations. The Steelton Borough Authority feels that these estimates are low when considering total project costs. That said, using these estimates, it is anticipated that the total cost for the Steelton Borough Authority to comply with the proposed rule could be as high as \$1M to \$1.5M. These numbers will be confirmed after completion of a more detailed evaluation. This is obviously a significant undertaking for the Authority especially considering that we are in the process of completing a \$2.1M clearwell improvements project and multiple water main replacement projects throughout our system. We would require an adequate amount of time in order to evaluate all of the options in order to select the most cost effective alternatives to address the proposed rule as described in our first comment. For reference, our system currently serves a total of approximately 9,000 equivalent dwelling units and we use a

surface water withdrawal from the Susquehanna River.

The Steelton Borough Authority would like to know whether or not the Board will consider the impact of the increased chlorine residual concentrations identified in the proposed rule on the owner's ability to comply with other rules including the Stage 2 Disinfection Byproducts Rule. Obviously, for those water systems struggling to meet the Stage 2 DBP Rule, the proposed Disinfection Requirements Rule may be especially difficult to address and will certainly require adequate time to address properly. Again, as noted above, we feel that adequate time must be provided to evaluate all of the alternatives before instituting the higher concentration requirements.

Thank you for considering the comments of the Steelton Borough Authority.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Patrick McDonnell

Patrick McDonnell
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov