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Municipal Authority Borough of Catawissa  
P.O.Box 54  
19 Schoolhouse Road  
Catawissa, PA 17820

RECEIVED  
IRRC

2011 SEP 26 P 3 39

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

September 25, 2017

RE: Proposed Rulemaking Chpt. 109 Safe Drinking Water General Update and Fees

Dear Members of the Board,

The Municipal Authority Borough of Catawissa (MABC) is a public water utility servicing approximately 1,600 customers through 600 connections. MABC is respectfully submitting the following comments, on the above referenced proposed rulemaking, for your consideration.

If you have any questions, please contact me, Cindy Bachman, Superintendent, MABC, at either 570-356-2172 or [catwat@ptd.net](mailto:catwat@ptd.net).

**109.1 Definitions.** MABC supports the recognition and inclusion of surface water intake protection zones into source water protection.

**109.301(11)(ii) Monitoring requirements for entry points that do not provide water continuously.**

In the Preamble, DEP anticipates that they will allow exceptions to this proposal and if or when the exempted source is to be utilized, the Department is to be notified and compliance monitoring is required before the source can be put in service.

If DEP is willing to allow these conditions for certain situations, it should be acceptable requirements for all sources and entry points that are not utilized on an annual basis. If a system is mandated to complete compliance monitoring for an entry point that has not been utilized for over a year, before it can go online, then this eliminates the public health risk factor. It also allows the system to determine when it is feasible for them to utilize their entry points.

If DEP is going to allow exemptions, they should have been stated in the proposed regulation for public comment. There should also be, at minimum, two years for this to take effect.

**109.1402 Annual fees.** In the Preamble, TAC recommended that DEP should request the funding from the Legislature. DEP did not comment on TAC's recommendation. If DEP did not request the funding, then any proposed fees should be delayed until they do.

With all of the proposed fees, systems will have to reevaluate what infrastructure maintenance/replacement/upgrade projects can be undertaken. Contrary to a common school of thought, increased system costs(fees) cannot always be arbitrarily "passed along" to the customer. Many systems have a limited customer base.