

Triple Divide Watershed Association Meeting
September 12, 2018

MINUTES

Comments from Operators/Municipalities

- Members discussed the possibility of sharing the services of certified Chief Water Operators among multiple systems.
- Genesee is in the finalization process and probes are being installed

Trainings/ Future Courses

- Discussion on the benefits of having a DEP representative educate water operators and staff on how to use the green port.
- Water Operators course—please send letters of support to TDWC Chair, Charlie Tuttle. The course is actually a 12 week course, once a week potential operator attends.
- Discussion on Rate Schedules

Updates from DEP (VIA EMAIL)

- New regulations on Chapter 105 and the new Annual Fees. Please see the following pages for the new changes.
- Notice of Annual Amalgamated Source Water Protection Coalition Meeting—Please consider attending and potentially car pool with other municipalities, the agenda states that Deb Rotz will further discuss the new drinking water regulations and fee schedules. Please see the following pages for the agenda.

Updates from Conservation District/Potter Co. Water Quality Work Group

- Jason Childs reported on various seminars that the PCCD will be hosting.
- General Permit application computer station will potentially be available for use for those without the proper technology regarding DEP's new standards.

Guest Speaker

- Wes Eaton, Water for Agriculture, Associate Professor-Penn State University
- Wes discussed what the Water for Agriculture initiative is, what his response from the various interviewees has been, and how the municipalities can take a role. He also discussed the slight disconnect between the agriculture community, conservation community, government communities, and the general public. WHAT CAN WE DO? How can we be stakeholders in closing the gap of these communities? How can we build trust and faith in our communities all together? Once, Wes is complete he will share what his findings from the research concludes.
- Thank you Wes for sharing, your presentation was extremely informative.

Changes under the recent General Update to 25 Pa Code §109 (the Safe Drinking Water Regulations)

The SDW General Update and Fees Rule was published as final on August 18, 2018. The full text of the regulation can be found here:

<https://pabulletin.com/secure/data/vol48/48-33/index.html>

A mailing and email notification is being developed for water systems. We are also developing staff and water supplier training on the new provisions.

In the meantime, below is a summary of the major provisions. Note that there are several provisions that take effect immediately and others that have delayed implementation dates.

General Update Provisions that are Effective Immediately:

Deleted the provision in Subchapter M (GWR) that allowed 5 samples within 24 hours of an E. coli-positive triggered (GW) source sample.

Consultation and corrective action deadlines for significant deficiencies "identified by the Department" have been revised to be consistent for all PWSs (using surface and ground water sources) and have been moved to a new subsection – § 109.717. Upon receiving written notice of a significant deficiency, the PWS must:

Consult with DEP within 30 days

Respond in writing within 45 days

Complete corrective actions in accordance with any plan review (e.g. permitting) processes within 120 days

Obtain written approval from DEP to modify an approved corrective action plan or schedule

Clarified that CWSs must mail a paper copy of the CCR to DEP. (NOTE: if your office is able to receive an electronic copy (in pdf format) you can accept that file in lieu of a paper copy.)

- PWSs with filtration must develop and implement a filter bed evaluation program acceptable to the Department, with results maintained on site and submitted upon Department request (§ 109.703).
- CWS/NTNC/TNC systems must develop and maintain on file a system map that includes the locations of treatment plants, storage facilities, pump stations, interconnections, monitoring locations, pressure zones and pipes (incl. size/construction material) – § 109.706.

- CWS/NTNC systems that have to install CCT must submit a permit application (the small GW system, pH/alkalinity only "exemption" has been eliminated).
- Labs/PWSs will need to ALSO report individual THM and HAA constituent results (in addition to the TTHM & HAAS compliance values) – § 109.701(a)(10).
- Updated/clarified definitions for source water protection area for SW and GW sources; updated requirements for water systems with an approved source water protection program (definitions; § 109.713).

New NCWSs that are not required to obtain a permit must submit an application prior to construction and operation (§ 109.505). The new NCWS application is nearing completion. Continue to use the BDF until the new application is complete.

- Permitting language has been updated to clarify the pre-drilling plan and permit application requirements (§ 109.503).
- DEP now has the regulatory basis to issue General Permits. Discussions are underway to determine which modifications are appropriate for coverage under a general permit.
- The reduced monitoring option for EP residual at small filter plants ($popl \leq 3,300$) has been eliminated.

Provisions with Delayed Implementation Dates:

By Aug 20, 2019:

- ALL filter plants (regardless of type and size) must have CONTINUOUS monitoring (and recording every 15 minutes) for both IFE and CFE turbidity. The reduced turbidity monitoring frequency for PWSs with $popl < 500$ is no longer allowed after August 19, 2019.
- ALL filter plants must be equipped with alarm capabilities (for IFE/CFE, EP disinfectant residual, minimum water level needed for Giardia inactivation); plants that are not staffed continuously while in operation must ALSO have shut-down capabilities. DEP may approve an alternate compliance schedule if the PWS submits a written request (with documentation) prior to Aug 19, 2019.
- CFE turbidity standards have been set for all systems with SW/GUDI sources using membrane filtration (those with existing permit conditions already have 0.15 NTU alarm/shutdowns in place that will ensure meeting these standards):
- 95% monthly turbidity measurements must be ≤ 0.15 NTU
- AT ALL TIMES, turbidity must be ≤ 1 NTU

Comprehensive Monitoring Plan (§109.718):

- All CWSs and NTNC systems must develop and submit a comprehensive monitoring plan by August 20, 2019.
- All reserve sources must be identified in operation permit (with specific permit conditions).
- PWSs must notify DEP and get written approval prior to using reserve sources; additional monitoring is required before/during use of reserve sources [§ 109.301(15); § 109.503(b); § 109.703(d)].
- The Comprehensive Monitoring Plan template is under development.

Resiliency (§ 109.708):

- All CWSs must complete an Uninterrupted System Service Plan (USSP) and submit certification to DEP by specific dates (by August of 2019 to 2021, based on system size). The USSP form is under development.
- CWSs may demonstrate resiliency through auxiliary power, storage, interconnections or combination of resources.
- CWSs may request additional time to address deficiencies identified in the USSP that require capital improvements.

SDW Fees (Subchapter N)

- Applies to ALL PWSs (including BVRBs)

Revised Permit Fees:

- Revised permit application and feasibility study fees – effective immediately
- New NCWS application fee – effective immediately
- Revised monitoring waiver fees – effective immediately
- Note: An email was sent to the Tech Chiefs ahead of final publication of the rule, with instructions to begin requiring the new fees for any application received on or after August 20.
- Updates to eFACTS are nearing completion to track the new fees

New Annual Fees:

- The New Annual Fees are effective beginning the first quarter of 2019. The fees will be based on the PWS population on the BASIC screen in PADWIS.
- The Annual Fees will be implemented, tracked and managed by CO staff.
- Fees will differ between Community Water Systems (CWS), Non-Transient Non-Community Water Systems (NTNC) and Transient Non-Community Systems (TNC) and differ based on population served
- Larger systems with fees over \$6,500 will have the option to pay in quarterly installments

CWS Annual Fees (Based on Population)

Population Served	Annual Fee	Cost/Person/Year
100 or less	\$250	\$2.50—\$10.00
101—500	\$500	\$1.00—\$4.95
501—1,000	\$1,000	\$1.00—\$2.00
1,001—2,000	\$2,000	\$1.00—\$2.00
2,001—3,300	\$4,000	\$1.21—\$2.00
3,301—5,000	\$6,500	\$1.30—\$1.97
5,001—10,000	\$10,000	\$1.00—\$2.00
10,001—25,000	\$20,000	\$0.80—\$2.00
25,001—50,000	\$25,000	\$0.50—\$1.00
50,001—75,000	\$30,000	\$0.40—\$0.60
75,001—100,000	\$35,000	\$0.35—\$0.47
100,001 or more	\$40,000	≤ \$0.40

Population Served Annual Fee

NTNCWS

100 or less	\$100
101—500	\$250
501—1,000	\$500
1,001—3,300	\$750
3,301 or more	\$1,000

TNCWS

100 or less	\$50
101—500	\$100
501—1,000	\$200
1,001 or more	\$500

BVRB

Bottled \$2,500

Vended \$1,000

Retail \$1,000

Bulk \$1,000

Annual Amalgamated Source Water Protection Coalition Meeting
In the Goddard Room at
The North Central Regional Office
Agenda

October 3, 2018

- 9:00 to 9:15 Coalition members arrive, meet, greet and snack on goodies
Eric Moore: Welcome, opening remarks Welcome and introductions.
- 9:15 to 10:00 Marcus Kohl, DEP NCRO will discuss a variety of topics that pertain to public water supplies.
- 10:00 to 10:15 Snack break
- 10:15 to 12:00 Deb Rotz - DEP, Safe Drinking Water Program Specialist
New drinking water regulations and fees schedules
- 12:00 to 12:30 Lunch on your own.
- 12:30 to 1:15 Megan Lehman, DEP Community Relations Contact;
DEP Communications and On-Line Tools
- 1:15 to 2:00 John Clue, Hydrogeologist U.S.G.S
Update for Baseline Groundwater Study for Lycoming, Bradford, Potter and Clinton counties and future projects.
- 2:00 to 2:45 Dr. Jenifer Whisner, Columbia-Montour Coalition for Source Water Protection, "Good Water = Good Life"
- 2:45 to 3:00 Closing remarks and general discussion with coalition chairpersons, planners, water suppliers and DEP Sanitarians