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Rec'd
10/4/07

2:22 p.m

September 28, 2007

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

Dear Ms. /Sir:

On behalf of the Philadelphia Water Department (PWD), I wish to thank you for the opportunity to comment on the Environmental Quality Board's proposal to amend 25 PA Code Chapter 109 relating to safe drinking water which appeared in Pennsylvania Bulletin dated September 1, 2007.

Lead and Copper

According to the 90th percentile lead and copper calculation, systems will report the number of samples taken during the monitoring period multiplied by 0.9. This seems to assume the multiplication comes up with a whole number. However, there may be cases where systems could encounter uncertainties in calculating the 90th percentile. E.g., a system with 63 samples ($0.9 \times 63 = 56.7$). PWD recommends that DEP specify the 90th percentile calculation by including a specific rounding up procedure.

The DEP is proposing to include sample location in reporting monitoring results. This could jeopardize our effort in customer recruitment and relationships with the customers who volunteered to participate in the LCR sampling program under a privacy assumption. Many of the participating customers wished their addresses not be publicized. PWD has reported to DEP with a sample location code in lieu of their addresses for our LCR reporting. Therefore, PWD recommends that provisions be made to protect the privacy of LCR sampling participants.

Sincerely,

Geoffrey L. Brock, Director
Bureau of Laboratory Services
Philadelphia Water Department
1500 E. Hunting Park Avenue
Philadelphia, PA 19124