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**Cooper, Kathy**

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**From:** Holly M. Fishel [hfishel@psats.org]  
**Sent:** Monday, October 01, 2007 2:00 PM  
**To:** RegComments@state.pa.us  
**Cc:** IRRC; Jewett, John H.  
**Subject:** EQB Proposed Rulemaking -- Comments on Regulation ID #7-412 (#2633)

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Environmental Quality Board  
PO Box 8477  
Harrisburg, PA 17105-8477

The following comments are in response to the Environmental Quality Board's proposed rulemaking in the September 1, 2007 issue of the Pennsylvania Bulletin concerning 25 Pa. Code Chapter 109, Regulation ID #7-412 (#2633):

- > In reviewing the proposed rulemaking regarding the department> '> s
- > general update to the safe drinking water regulations (Chapter 109),
- > we commend the department for taking effective action to retain the
- > state> '> s primacy concerning enforcement and oversight of drinking
- > water for the public health and welfare. Furthermore, we support the
- > open and inclusive manner in which the department worked with the
- > Small Water Systems Technical Advisory Committee (TAC) during the
- > development of these regulations.
- >
- > And while we understand that the majority of these changes are the
- > result of modifications mandated by federal regulations, we remain concerned about the cumulative impact on the cost
- > of complying with increasingly stringent regulations by small water systems across the state, in particular the more than
- > 3,300 systems that serve fewer than 500 persons.
- >
- > Regarding the department> '> s request for comments on the mandatory
- > electronic reporting requirements, we again reiterate the concern that
- > not all areas of the state are served by suitable Internet connection
- > to facilitate such data transfer, especially in the more remote areas
- > where such systems tend to be located.
- >
- > Therefore, we request that some provision be developed and included in
- > the final-form regulations which would allow water systems to
- > voluntarily opt-out of any mandatory electronic reporting requirement.
- >
- > Thank you.

Sincerely,

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