

3136

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, April 22, 2016 10:11 AM
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:

Anthony J. Bellito, Jr., P.E.
North Penn Water Authority (abellitto@northpennwater.org)
300 Forty Foot Road
Lansdale, PA 19446 US

RECEIVED
IRRC
2016 APR 22 AM 11:50

Comments entered:

We at the North Penn Water Authority are strongly opposed to the proposed new DEP regulations on chlorine residual levels in the water distribution system. We believe it is best to require a minimum chlorine residual of 0.1 mg/l rather than the currently proposed 0.2 mg/l level. This should also be enforced for 95% of the distribution system samples, rather than for 100%, as was previously proposed in a prior draft of the regulations. Also, we believe it is best to enforce a "find and fix" approach when the required chlorine residual level is not maintained, rather than requiring Public Notifications (PN) to customers. Such PN's give no useful information to customers, but only cause a lot of confusion. PNs in these circumstances would only serve to scare large numbers of customers unnecessarily into thinking that their drinking water is unsafe. It will totally undermine public confidence in the drinking water supply, and for no reason. Chlorine levels currently measured below 0.2 mg/l in hundreds of water systems across Pennsylvania today are safely serving millions of people, and are not causing any documented illnesses or negative health effects to people. DEP's position that chlorine levels below 0.2 mg/l might cause people to get sick is absurd, considering that nobody is getting sick today at current chlorine levels, and there are no outbreaks of waterborne illnesses in our service area that could possibly be correlated to the occurrence of chlorine levels below 0.2 mg/l in our distribution system. We agree that the chlorine residual level must be detectable, and we support raising it above the current 0.02 mg/l, but to increase it ten-fold to 0.2 mg/l is completely unjustified and unsupported by scientific evidence. Indeed, the best evidence we have to support our position is the operational experience of hundreds of public and private water utilities, serving literally millions of people, over many, many years, in which chlorine levels below 0.2 mg/l are not causing anyone to get sick. So what is the problem that DEP is attempting to solve with this overly burdensome new requirement?

A new chlorine residual requirement as high as 0.2 mg/l will also surely cause an increase in disinfection byproducts (DBP's) in our distribution system, which we know is harmful to public health at higher levels. So why risk this known negative consequence in order to attempt to "fix" a problem that does not even exist right now? It makes no sense at all. This is regulatory rulemaking from Harrisburg again running amok.

A new chlorine residual requirement as high as 0.2 mg/l will also surely cause taste and odor complaints from our customers that is not now a problem. Should we send all those complaint calls to someone in Harrisburg to explain that it's all because the regulatory bureaucrats are requiring us to increase the chlorine without a defensible reason?

A new chlorine residual requirement as high as 0.2 mg/l will also surely cost us millions of dollars in system upgrades (capital and operating costs), including more chlorine booster facilities, tank mixing equipment, looping of new water mains, and other infrastructure improvements. No cost-benefit analysis has been done by DEP to validate that these significant cost increases will result in any measurable benefits to public health. There is no direct correlation between chlorine residual level and the presence or absence of bacteriological activity in the distribution system, or of documented illnesses among customers.

DEP needs to be reminded that the water utilities are not responsible for premise plumbing problems in homes, businesses, schools, hospitals, hotels, and all other commercial and industrial facilities. Further regulations on increasing chlorine levels in the distribution system will not fix the known problems within the building footprint of these customers. Those problems with premise plumbing should be addressed separately.

The bottom line is that our water is treated in a highly advanced, state-of-the-art water treatment plant at Forest Park, which includes membrane treatment and ozonation. Our distribution system and storage tanks are well maintained and flushed to ensure that water quality remains excellent throughout our piping network, until it reaches the customer. Our water quality delivered to our customers is consistently excellent, not just good enough. Our water quality is one of the best in the state of Pennsylvania, if not one of the best in the entire nation. We have worked hard for many years to build public confidence in the reliability and quality of our water. We never have any violations, which we are very proud of. Yet, for no defensible reason, DEP's proposed increase in chlorine residual levels to 0.2 mg/l will result in the issuance of unnecessary Public Notifications which will just scare our customers, for no reason and for no benefit. This will erode public confidence in our water system. When our customers call to complain about these violations, we will just have to tell them that our water quality is the same excellent quality it always was in the the past, and we will have no choice but to point the finger of blame at the DEP for changing the rules without justification. I certainly hope that does not have to happen.

A resolution of this dilemma would be for DEP to listen to reason, and agree to our request to make the new requirement be 0.1 mg/l instead of 0.2 mg/l in the distribution system. That would be the most sane and justifiable action.

Thank you for your consideration of these comments.

No attachments were included as part of this comment.

Please contact me if you have any questions.