

# St. Marys Area Water Authority

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April 5, 2016

DEP - Bureau of Safe Drinking Water  
P.O. Box 8467  
Harrisburg, PA 17105-8464

Attention: Lisa D. Daniels, Director, Bureau of Safe Drinking Water

Subject: **Public Comments to the Environmental Quality Board  
Disinfection Residual Requirement Rule**

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Dear Ms. Daniels:

The St. Marys Area Water Authority does not support the Department's efforts to amend Chapter 109 as put forth in the Disinfection Requirement Rule. Our problems with the proposed rule deal primarily with the following:

- Raising of the current distribution residual from the current 0.02 mg/l to 0.20 mg/l (a ten-fold increase) with no justification. This new rule will increase the amount of chlorine that we must use for disinfection with no clearly defined public health benefit. We join the many water suppliers in Pennsylvania that have commented on this proposed rule and said that "adding more chemicals to treat water is not always the best method".
- Increased formation of chlorine-related, disinfection-by-products (DBP) will result when we raise our chlorine level to meet this proposed rule. DBP's are known carcinogens and we do not want to increase exposure of these compounds to our customers when there is no justification.
- The notion that implementation of this rule will be easily accomplished with very little cost on the part of water suppliers (i.e. rate paying customers). We believe that the Department has significantly underestimated the time and money that will need to be spent by water suppliers in Pennsylvania to comply with this new rule. We estimate that it would take us two to three years to implement this rule due to the likely addition of a chlorine booster station in at least one of our pressure districts.
- The Department's proposal to remove HPC (Heterotrophic Plate Count) as an alternative compliance criterion for a low chlorine residual situation. We believe that HPC should remain as an alternative compliance criterion for all water systems as it is a useful tool for water suppliers to gage the health of the distribution system.
- The notion that lack of an adequate chlorine residual in a water distribution system may increase the likelihood that Legionella are present. It is our understanding that elevated chlorine residual will not completely remove or destroy Legionella. Furthermore, it is our understanding that Legionella must multiply (or amplify) to cause harm and the amplification usually happens within premise plumbing and is not a distribution system

issue.

We hope that the Department considers carefully our comment concerning this proposed rule and that of all Pennsylvania's water suppliers. If the chlorine residual must be raised then we are in agreement with the Technical Advisory Board's recommendation of 0.1 mg/l for both free and total chlorine, 95% of the time.

Thank you for the opportunity to comment.

Very truly yours,

**ST. MARYS AREA WATER AUTHORITY**



Dwight D. Hoare, P.E.  
Manager

cc: Board of Governors  
PMAA, Jennifer Case