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The Hospital + Healthsystem  
Association of Pennsylvania

*Leading for Better Health*

June 22, 2018

Laura Fusare Edinger  
Regulatory Coordinator  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA

RECEIVED  
IRRC  
2018 JUN 25 A 10:42

**RE:** Final Rulemaking: Safe Drinking Water General Update and Fees (25 Pa. Code Chapter 109)

Dear Ms. Edinger:

The Hospital and Healthsystem Association of Pennsylvania (HAP)—representing 240 member hospitals and health systems—appreciates the submission to the Independent Regulatory Review Commission (IRRC) of a final rulemaking regarding safe drinking water.

Pennsylvania healthcare facilities are dedicated to providing safe, high quality care to the patients they serve. A healthcare facility's potable water supply is provided by a public water utility. Many healthcare facilities consider providing supplemental disinfection to the healthcare facility's water supply to provide additional protections for its patients and employees at their facility.

HAP had met with Department of Environmental Protection (DEP) officials previously and shared that many healthcare facilities consider providing supplemental disinfection to the healthcare facilities' water supply to provide additional protections for its patients and employees at the facility. We discussed that the current regulations do not take into account the unique circumstances that occur in the healthcare facility setting.

We were informed that regulations were being promulgated to provide for the implementation of a general permit process that would allow hospitals the opportunity to register for approval to provide supplemental disinfection to the healthcare facilities' water supply. HAP had submitted comments to the proposed rulemaking.

HAP is encouraged by DEP's response to our comments wherein you indicate that *"when the Department is ready to move forward with issuing a draft general permit(s), the public participation process will ensure ample opportunity to provide comment on the scope and coverage of the general permit(s)."*



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HAP welcomes the opportunity to collaborate with DEP to design a general permit process for the implementation of supplemental disinfection systems for healthcare facilities. We look forward to working with you to develop a process that will specifically address the hospital community's needs.

Thank you.

A handwritten signature in black ink, reading 'Jeffrey W. Bechtel'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeffrey W. Bechtel  
Senior Vice President  
Health Economics and Policy