LEGISLATIVE AND REGULATORY UPDATE

PA Section AWWA North/South Central District and WWOAP Central Section
Fall Joint Conference – November 16, 2018
Presented by: Serena A. DiMagno
WWOAP Legislative/Regulatory Affairs Committee Chairman
Election Update

• **US HOUSE and SENATE**
  Democrats won control of the US House, gaining more than 23 seats needed for a majority. Democrats have control of the US House for the first time since 2010.
  Republicans are expected to retain their seats in the US Senate, gaining two seats. However, Bob Casey, Democrat won his second six-year term in the US Senate.

• **PA HOUSE AND SENATE**
  Democrats won 13 seats in the House and 5 seats in the Senate. Republicans still have a majority in both the House (110-93) and Senate (29-21), however, the Senate Republicans no longer retain a veto-proof majority.

• **GOVERNOR**
  Democrat Tom Wolf won a second and final four-year term. John Fetterman (Mayor of Braddock, PA) is the new Lieutenant Governor having defeated Lt. Gov. Mike Stack in the primary.
House and Senate Session Schedule

October 17, 2018 was the final voting day of the 2017-2018 Legislative Session for both the House and Senate.

• **2018 HOUSE SESSION SCHEDULE**

  November 13 (Caucus leadership elections)

• **2018 SENATE SESSION SCHEDULE**

  November 14 (Caucus leadership elections)

Note: 2019 Session Schedule Not Yet Available.
House Republicans elected the following leadership:

**Speaker Nominee** - Representative Mike Turzai (R-Allegheny)
The Speaker is voted on by the entire House on January 1st, Swearing-in-day.

**Majority Leader** – Representative Bryan Cutler (R-Lancaster)

**Majority Whip** – Representative Kerry Benninghoff (R-Centre)

**Majority Appropriations Chairman** – Representative Stan Saylor (R-York)

**Republican Caucus Chairman** – Representative Marcy Toepel (R-Montgomery)

**Policy Chairman** – Representative Donna Oberlander (R-Clarion)

**Caucus Administrator** – Representative Kurt Masser (R-Northumberland)

**Caucus Secretary** – Representative Mike Reese (R-Westmoreland)
House Democrats elected the following leadership:

**Leader** – Representative Frank Dermody (D-Allegheny)

**Whip** – Representative Jordan Harris (D-Philadelphia)

**Appropriations Chairman** – Representative Matt Bradford (D-Montgomery)

**Caucus Chairman** – Representative Joanna McClinton (D-Philadelphia)

**Policy Chairman** – Representative Mike Sturia (D-Lancaster)

**Caucus Administrator** – Representative Neal Goodman (D-Schuylkill)

**Caucus Secretary** – Representative Rosita Youngblood (D-Philadelphia)
Senate Republicans elected the following leadership:

**Senate President Pro Tempore** – Senator Joe Scarnati (R-Jefferson)

**Leader** – Senator Jake Corman (R-Centre)

**Whip** – Senator John Gordner (R-Columbia)

**Appropriations Chairman** – Senator Patrick Browne (R-Lehigh)

**Caucus Chairman** – Senator Bob Mensch (R-Montgomery)

**Policy Chairman** – Senator David Argall (R Schuylkill)

**Caucus Administrator** – To be appointed by the President Pro Tempore

**Caucus Secretary** – Senator Richard Alloway (R-Franklin)
Senate Democrats elected the following leadership:

**Senate Democratic Leader** – Senator Jay Costa (D-Allegheny)

**Whip** – Senator Anthony Williams (D-Philadelphia)

**Appropriations Chairman** – Senator Vincent Hughes (D-Philadelphia)

**Caucus Chairman** – Senator Wayne Fontana (D-Allegheny)

**Policy Chairman** – Senator Lisa Boscola (D-Northampton)

**Caucus Administrator** – Senator John Blake (D-Lackawanna)

**Caucus Secretary** – Senator Larry Farnese (D-Philadelphia)
Federal Regulation – America’s Infrastructure Act of 2018 (AWIA)

New Requirements under the newly enacted America’s Infrastructure Act of 2018:

– Security
– Resiliency
– Emergency Response
– Consumer Confidence Reports
– Grants
Federal Regulation – America’s Infrastructure Act of 2018 (AWIA)

Section 2005 – Drinking water infrastructure resilience and sustainability

• Provides grant opportunities for states to assist or otherwise carry out necessary and appropriate activities concerning contaminated drinking water, provided by a public water system or underground source of drinking water in an underserved and disadvantaged community when an imminent and substantial endangerment is present

• **NOTE**: although the Act discusses grants, be aware that authorization of funding does not mean that the funds have been appropriated, that is, provided to EPA for award to community water systems to complete the work described in the Act.
Federal Regulation – America’s Infrastructure Act of 2018 (AWIA) – cont’d.

**Section 2007 – Innovative water technology grant program**

- Authorizes $10 million in grants in fiscal years 2019 and 2020 for competively awarded grants to develop, test, and deploy innovative water technologies or provide technical assistance to deploy these technologies.

**Section 2008 – Improved consumer confidence reports**

- Requires community water systems serving more than 10,000 persons, to provide a CCR to each customer of the system *at least biannually (twice/year).*

- EPA is required to improve the format of the CCR to increase understandability and usefulness to non-technical readers. May require EPA to develop revised regulations.
Federal Regulation – America’s Infrastructure Act of 2018 (AWIA) – cont’d.

Section 2013 – Community water system risk and resilience

• Replace the provisions in the Safe Drinking Water Act (SDWA) regarding anti-terrorism activities and instead, in line with existing water system practices, creates requirements for assessing risks from malevolent acts, including terrorism, and resilience to natural hazards and emergency response plans to those threats by community water systems serving more than 3,300 persons.

• Requires certification to EPA that the assessment was complete and due dates are phased in by water system size:
  – ≥ 100,000 persons by March 31, 2020
  – 50,000 to ≤ 100,000 persons by December 31, 2020, and
  – 3,300 to < 50,000 persons by June 30, 2021.
Section 2013 – Community water system risk and resilience – cont’d.

- Six months after the assessment certification, another certification is due to EPA that the Emergency Response Plan has been updated to incorporate findings of the assessment.

- Assessments are required to be reviewed every 5 years to determine whether the assessment must be revised. A certification that the review was conducted, and revised if applicable, is required to be submitted to EPA.

- EPA must develop guidance materials for the assessments, including baseline threat information which is due no later than August 1, 2019, as well as information on how to submit certifications. This guidance from EPA may not be available Summer, 2019.

- Please do not submit risk assessments to EPA. EPA does not want to receive these sensitive documents.
Federal Regulation – America’s Infrastructure Act of 2018 (AWIA) – cont’d.

**Section 2018 – Source water**

- Amends the Emergency Planning and Community Right to Know Act to help community water systems better understand real and potential threats to their source water. This section is designed to enable water suppliers obtain more details about what is stored upstream of their sources.
Federal Regulation – Other Initiatives

**UCMR4 – Monitoring Period – 2018-2020**
- 30 Contaminants on the UCMR4 List
- Includes Cyanotoxins for systems using Surface Water Sources
- Metals
- Pesticides
- Disinfection Byproducts (DBPs)
- Alcohols
- VOCs

• All Community Water Systems and Non-transient Non-Community Systems serving more than 10,000 people must monitor at the system’s expense.

• 800 randomly selected small systems must monitor at EPA’s expense.
Federal Regulation – Other Initiatives – cont’d.

**EPA Long-term revisions to the Lead and Copper Rule**

Revisions are no longer expected for February, 2019. The anticipated date is later in the year.
Federal Regulation – Other Initiatives – cont’d.

WATER INFRASTRUCTURE FINANCE AND INNOVATION ACT (WIFIA) -

WEBINAR – WIFIA PROGRAM OVERVIEW
November 28, 2018
2:00 p.m. – 3:30 p.m. (Eastern Time)
Learn about key aspects of the WIFIA Program, including eligibility requirements, statutory terms and conditions, and federal requirements.

WEBINAR – WIFIA APPLICATION PROCESS
December 5, 2018
2:00 p.m. – 3:30 p.m. (Eastern Time)
Learn about the WIFIA application process, including the Letter of Interest submission, evaluation, and selection.
Governor’s Executive Order – PFAS - continued

• On September 19, 2018, Governor Wolf established the Perfluoroalkyl and Polyfluoroalkyl (PFAS) Action Team.

• The Action Team shall develop a comprehensive response to identify and eliminate sources of PFAS contamination.

• The Governor directed DEP to develop a PFAS sampling plan to test public water systems throughout the state:
  – Water systems are to be selected based on risk characteristics developed by DEP.
  – Sampling will be conducted by DEP or by a contract laboratory (or laboratories) selected by DEP.
The PFAS Action Team is comprised of the following:

1. The Secretary of the Department of Environmental Protection, who will be the Chairperson of the Action Team
2. The Secretary of the Department of Health
3. The Secretary of the Department of Military and Veteran Affairs
4. The Secretary of the Department of Community and Economic Development
5. The Secretary of the Department of Transportation (PennDot)
6. The Secretary of Agriculture
7. The State Fire Commissioner

The Secretary of the Department of Labor and Industry, the Executive Director of the Fish and Boat Commission, and the Chairperson of the Public Utility Commission may participate in the functions of the PFAS Action Team as requested by the Chair.

Each agency Secretary, Executive Director, and Chairperson on the PFAS Action Team may designate an appropriate member of their staff to participate on their behalf.
NOTE: The Action Team met on October 18, 2018 and announced that opportunities will be given to the public, interest groups, and the water industry to provide input to the PFAS Action Team:

The PFAS Action Team Meeting on November 30, 2018 at 9:00 AM at the Rachel Carson State Office Building in Harrisburg. The meeting will be open to the public and feature presentations from experts from state governments and the U.S. EPA about PFAS contamination. There will be time for public comments. To propose a presentation topic including known sources of PFAS chemicals, health limits and impacts and environmental impacts, contact: raepthepolicyoffice@pa.gov
The Action Team will take public comment through the DEP eComment tool – https://www.ahs.dep.pa.gov/eComment/
Rulemaking Petition: MCL for PFOA

• In August, 2017 the Environmental Quality Board (EQB) accepted a petition from the Delaware River Keeper to set an MCL for PFOA.

• PA DEP expected to be back to EQB by June, 2018 with a recommendation on whether or not to move forward with developing an MCL.

• PA DEP has never set its own drinking water MCLs, instead adopting the federal Safe Drinking Water Program MCLs due to the millions of dollars in cost required to complete the human health and environmental studies needed to establish an MCL to be scientifically credible.

• Status - PA DEP and the Department of Health recently told the EQB that the lack of a state toxicologist has delayed evaluation of the rulemaking. Efforts to hire a state toxicologist have not been successful.
Act 39 of 2018 – Amended the School Code – Section 742 – Lead Testing

- Addresses the threat of lead in drinking water in PA schools. Signed into law on 6/22/18.

- From 2012-2015 PA had the highest occurrence of elevated levels of lead in daycare and school drinking water.

- The Legislature added language in HB 1448 (Public School Code) budget bill that requires schools to supply safe water if testing concludes the school supply is unsafe:

- Beginning in the 2018-19 school year and every school year thereafter, school facilities where children attend school may be tested for lead levels in the drinking water and any school facility whose testing shows lead levels in excess of the maximum contaminant level goal or milligrams per liter as set by the EPA’s national primary drinking water regulations shall immediately implement a plan to ensure no child or adult is exposed to lead contaminated drinking water and that alternative sources of drinking water are made available.
Act 39 of 2018 – continued

• Established conflicting lead standards, maximum contaminant level goal (MCLG) is 0 mg/l.

• If a school does not test lead levels, the school entity shall, at a public meeting, discuss lead issues in the school facilities.

• If a test of lead levels is elevated the level must be reported to the Department of Education and posted on the Department’s publicly accessible website.

• Included in the legislation is language that requires schools to supply safe water if testing concludes that the supply is found unsuitable.

• PA DEP is working with the PA Department of Education (PDE) on guidance for schools.
Act 39 of 2018 - continued

• If a school is a nontransient noncommunity water system, the school already must test for lead and falls under the current PA DEP rules/procedures for lead testing.

• However, if a school is not considered a water system and is simply a customer of a community water system, then confusion may result since the standards for lead contamination are different. The Act requires PA DEP and PDE to develop testing regulations when PA DEP already has the regulations in place. Remediation is also required for lead service line replacement but the overarching question is who pays for the replacement?

• EPA has new version of the guidance (Training, Testing, Taking Action) for schools: “3 T’s for Reducing Lead in Drinking Water in Schools” available on EPA’s website. https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit
Act 39 of 2018 - continued

- The Pennsylvania Department of Education (PDE) has updated the Safe Schools section of the PDE website with guidance regarding lead in drinking water per the provisions of Act 39 of 2018. Questions can be sent to the PDE Office for Safe Schools at RAEDSAFESCHOOLSREP@pa.gov
Act 78 of 2018 – Drone Use

• Amends Title 18 (Crimes and Offenses) and 53 (Municipalities Generally), defining the offense of unlawful use of unmanned aircraft; and prohibiting local regulation of unmanned aircraft.

• Bans the use of unmanned aerial vehicles (drones) over critical infrastructure in Pennsylvania.

• Governor Wolf signed HB 1346 into law on October 12, 2018, now Act 78 of 2018.
Regulatory Change in Manganese Limits

• In August 2017, the Administrative Code was amended to require the EQB to promulgate regulations for a water quality standard for manganese. Current manganese standard is 1 mg/l at the point of discharge.

• The change allows coal companies (and non-profits) to save millions of dollars in treatment of acid mine drainage. Coal interests claimed PA’s standards were more stringent than neighboring states and required costly and unnecessary treatment to remove manganese from mine water before discharging it.

• The new amendment moves the point of compliance from the discharge point to the drinking water intake.
Regulatory Change in Manganese Limits – cont’d.

• Coal companies argued that dilution will protect drinking water sources and that the new standard of 1 milligram per liter (mg/l) will have no impact on drinking water systems.

• The 1 mg/l limit is 20 times the amount permitted in drinking water – 0.05 mg/l. It should be noted that EPA regulates manganese as a secondary water contaminant for aesthetic considerations. In PA, secondary contaminants, including manganese are regulated as enforceable limits.

• EPA is currently re-evaluating manganese limits due to concerns that elevated manganese levels may cause neurological harm to infants and children.
Water Industry Concerns - Manganese Limits – cont’d.

• Coal companies are not the sole significant dischargers of manganese. Others include chemical companies, metals manufacturers, coal-fired power plants and wastewater treatment plants to name a few.

• PA DEP has issued more than 900 NPDES permits with manganese limits for non-coal mining related dischargers.

• Water systems will be required to remove manganese in their treatment processes to meet the 0.05 mg/l drinking water standard and will incur the capital costs to install additional treatment systems and the increased annual operating costs for chemicals and monitoring associated with manganese removal.
Water Industry Concerns - Manganese Limits – cont’d.

• PA DEP is seeking input from public water suppliers regarding the impacts that water suppliers will incur from the manganese rule change. Water suppliers need to put a dollar figure to the impacts and also apprise legislators of the costs associated with the budget bill change.

• The manganese water quality limit change is a significant deviation from the way in which regulators have established water quality standards. Clean Water Action and other environmental organizations are examining the legality of the manganese provision being inserted in the budget bill. The precedent is very concerning and could lead to additional changes in water quality standards occurring in a similar fashion.
Chapter 91 & 92a Fee Amendments – Proposed Rule

- Chapter 91 (Water Quality Management (WQM) Permits - Existing Fees from $250.00 – $7,500 are proposed to increase to $500.00 - $15,000.

- Chapter 92a NPDES Permits – Existing Fees from $50 - $500 are proposed to increase to $50.00 - $1500.00

- The proposed fee package is expected to go to the Environmental Quality Board (EQB) at the October 16, 2018 meeting.

- The proposed rule will be available at: [https://www.dep.pa.gov/PublicParticipation/EnvironmentalQuality/2018%20Meetings/Pages/default.aspx](https://www.dep.pa.gov/PublicParticipation/EnvironmentalQuality/2018%20Meetings/Pages/default.aspx) Click on October 16, 2018
Chapter 109 General Update/Fees - Status

- The Safe Drinking Water General Update and Fees Final Rule was published in the PA Bulletin on August 18, 2018 and became effective as of that date.

- The final rulemaking is available on the PA Bulletin website at: https://www.pabulletin.com/secure/data/vol48/48-33/index.html

- The final rule incorporates the general Chapter 109 update provisions that were separated from the proposed Revised Total Coliform Rule (RTCR) by the EQB on April 21, 2015.
Chapter 109 General Update/Fees - Provisions

- Amends existing permit fees and adds new annual fees to supplement DEP’s costs and fill the funding gap of $7.5 million:

**Annual Fee Ranges for:**
- Community Water Systems (CWSs) - $250.00 to $40,000.00
  (Example: a system serving 5,001 to 10,000 population – Annual Fee is $10,000) 100,000 population or more – Annual Fee is $40,000)
- Non-Community Water Systems (NCWSs) - $50.00 to $1,000.00
- Bottled, Vended, Retail and Bulk Water Haulers (BVRB) - $1,000.00 to $2,500.00

**NOTE:** Fees are based on PWSID Number and Population.

**Permit Fees**
- Permit/Major Amendment $300 - $10,000
- Minor Amendment $100 - $5,000
Chapter 109 General Update/Fees - Provisions - Cont’d.

• Provides for new requirements for the following:
  – Treatment plant alarm and shut-down capabilities
  – Auxiliary power requirements (See the Uninterrupted System Service Plan (USSP) Draft Form: http://files.dep.state.pa.us/PublicParticipation/Advisory%20Committees/AdvCommPortalFiles/TAC/Form%203_USSP%26CertForm_DRAFT.pdf
    – **NOTE**: The TAC Board will be revisiting public water suppliers concerns regarding the USSP form at the January 31, 2019 Meeting. Please review and provide comments/concerns.

• Revises treatment technique requirements for pathogens by adding specific turbidity performance requirements for membrane filtration.

• Deletes the provision that allowed a PWS to avoid corrective action after an *E. coli*-positive triggered source water sample by collecting five additional source water samples.
Chapter 109 General Update/Fees - Provisions - Cont’d.

- Revises and clarifies the monitoring, calibration, recording and reporting requirements for the measurement of turbidity.

- Amends the disinfection profiling and benchmarking requirements to clarify that all PWSs using filtered surface water or groundwater under the direct influence of surface water (GUDI) must consult with PA DEP prior to making significant changes to disinfection practices to ensure adequate Giardia inactivation is maintained.

- Clarifies permitting requirements for new sources by requiring:
  - Source water assessment
  - Pre-drilling plan
  - Evaluation of water quantity and quality
  - Hydrogeologic report
Chapter 109 General Update/Fees - Provisions - Cont’d.

- Clarifies the source water assessment, source water protection area, and source water protection program elements and requirements.

- Clarifies system management responsibilities relating to source water assessments and sanitary surveys.

- Addresses concerns DEP had related to gaps in the monitoring, reporting, and tracking of back-up sources of supply. Requires that all entry points and permitted sources are monitored at least annually, or when in use.

- Adds new amendments to establish the regulatory basis for issuing general permits.
Chapter 109 General Update/Fees - Implementation Dates

- The new annual fees will be required beginning January 1, 2019 to allow systems to include the new fees in their 2019 budgets.

- Alarm and shut-down capability requirements will be required one year after the effective date (by August 18, 2019) unless an alternate compliance schedule is approved in writing by DEP.

- Amended monitoring requirements for reserve sources and entry points are required one year after the effective date (by August 18, 2019).

- New comprehensive monitoring plan requirements are required one year after the effective date (August 18, 2019).
Disinfection Requirements Rule (DRR) - Status

• The Disinfection Requirements Final-Form Rulemaking was published in the PA Bulletin on **April 28, 2018**. The Regulations became effective upon the publication date.

• **PROVISIONS EFFECTIVE NOW:**

• *Distribution System Residual Data* – All water systems reporting distribution system disinfectant residual data must begin reporting individual residual measurements instead of the average result value and number of measurements. Beginning May 2018, all *individual* disinfectant residual measurements (reported by June 10, 2018) should be reported using the SDWA-1 format. The following are specific reporting instructions:
Disinfection Requirements Rule (DRR) – Provisions cont’d.

- **Minimum Entry Point Disinfectant Residual**: Water systems using filtered surface water or GUDI (Groundwater Under Direct Influence) sources must maintain a minimum disinfectant residual at the entry point (EP) of at least 0.2 mg/l. (Previously the minimum residual was 0.2 mg/l). The minimum residual for water systems with 4-log disinfection of GW sources remains the same.

- **Calculating and Reporting Log Inactivation**: Water systems using filtered surface water or GUDI sources must calculate the *Giardia* log (%) inactivation at least once/day during the hour of expected peak flow. If the *Giardia* log inactivation is less than 1.0 log (90%), the *Giardia* log inactivation calculation should be continued to be calculated every 4 hours until the *Giardia* log inactivation is at least 1.0.

  - The *Giardia* log inactivation calculation components are not reported to DEP with the log inactivation value (except for the EP chlorine residuals) but the information needs to be made available to DEP upon request. Accurate records must be maintained for chlorine residual, pH, flow (gpm), tank volume (gal), and baffling factor, and temperature (°C).

  - If a disinfectant other than free chlorine is used to achieve some portion of the minimum *Giardia* log inactivation, the log inactivation value for viruses must also be calculated at the same time using the same data.
Disinfection Requirements Rule (DRR) – Provisions cont’d.

– Log inactivation must also be calculated whenever the EP disinfectant residual falls below 0.20 mg/l and continue to be calculated every 4 hours until the residual is ≥0.20 mg/l.

– The log inactivation values must be reported monthly, beginning with the May, 2018 compliance period. May, 2018 CT values needed to be reported by June 10, 2018.

– Failure to maintain the log inactivation for more than 4 hours is a breakdown in treatment requiring Tier 1 Public Notification (Boil Water Advisory). Failure to maintain the EP residual of 0.20 mg/l for more than 4 hours is a treatment technique violation requiring Tier 2 Public Notification.
Disinfection Requirements Rule (DRR) – Provisions cont’d.

– Instructions and tools for calculating and reporting log inactivation values are available here:

• Giardia Inactivation Calculation Instructions
  http://files.dep.state.pa.us/Water/BSDW/DrinkingWaterManagement/Regulations/Giardia%20Inactivation%20Calculation%20instructions.docx

• Giardia & Virus Log Inactivation Calculation Tool May 2018 (Excel)
  http://files.dep.state.pa.us/Water/BSDW/DrinkingWaterManagement/Regulations/Giardia%20and%20Virus%20Log%20Inactivation%20Calculations%20Tool_May%202018.xls

• DRR Log Inactivation Reporting Instructions (PDF)
  http://files.dep.state.pa.us/Water/BSDW/DrinkingWaterManagement/Regulations/DRR%20Log%20Inactivation%20Reporting%20Instructions.pdf
Disinfection Requirements Rule (DRR) - Provisions cont’d.

**DRR PROVISIONS WITH DELAYED IMPLEMENTATION:**

- Sample Siting Plan: **By October 29, 2018**, all Community Water Systems (CWSs), any Non-Transient Non-Community (NTNC) system with filtration of surface water or GUDI sources or 4-log disinfection of GW sources must develop and submit a DRR sampling plan. The plan must include representative locations:
  - Dead ends
  - Storage facilities
  - Interconnections
  - Areas of high water age
  - Areas with previous RTCR detects
  - Mixing zones
  - Sample collection schedule

- The plan may be combined with the RTCR sampling plan if all content elements are included.
**Disinfection Requirements Rule (DRR) - Provisions cont’d.**

- **Distribution System Minimum Residual**: Beginning April 29, 2019, all CWSs, any NTNC system with chemical disinfection and any TNC (Transient Non-Community) water system with filtration of surface water or GUDI sources or 4-log disinfection of GW sources must maintain a minimum disinfectant residual concentration in the distribution system of at least 0.2 mg/l.
  
  - Disinfectant residual measurements must continue to be collected at representative locations at the same time and location(s) as coliform samples.
  
  - Disinfectant residual measurements must also be conducted at least once/week. Water systems that do not collect at least 1 coliform sample each week will need to conduct additional disinfectant residual measurements each week that a coliform sample is not collected.
  
  - Any location that has a disinfectant residual less than 0.2 mg/l in a month must also be sampled the following month. The HPC alternative compliance criteria is **eliminated**.
Chlorine Residual is an Accreditation by Rule Parameter -

- Only the following entities may conduct disinfectant residual measurements:
  - Accredited laboratory
  - Appropriately certified operator
  - Anyone using a written Standard Operating Procedure (SOP) established by an appropriately certified operator

Note: Chlorine Disinfectant monitoring must be done in accordance with Method 334.
Disinfection Requirements Rule (DRR) - Provisions cont’d.

• **Nitrification Control Plan:** By **April 29, 2019**, any CWS or NTNC system using chloramines or purchasing water treated with chloramines must develop and implement a nitrification control plan. The plan must conform to industry standards (such as AWWA’s M56 Manual on Nitrification) and contain a system-specific monitoring plan and a response plan with expected water quality ranges and action levels. The plan must be updated as necessary, retained on-site and made available to DEP upon request.
Speaker Contact Information

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