

**IMPORTANT MESSAGE FROM THE PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL
PROTECTION (DEP), BUREAU OF SAFE DRINKING WATER (BSDW)**

This message is to remind you of the importance of continuing to monitor and report as required under both the federal and Pennsylvania's Safe Drinking Water regulations. As you are aware, public water systems have a heightened responsibility to protect public health because unsafe drinking water can lead to serious illnesses and access to clean water for drinking and handwashing is critical during this crisis. Public water systems need to continue to manage and operate their facilities in a manner that is safe and that protects the public. This includes maintaining treatment and ensuring sample collection and analyses are conducted as required.

BSDW has received several questions regarding whether alterations would be allowed in sampling locations or whether any exceptions would be granted from required monitoring. At this time, there are no exceptions for required monitoring; however, there are some instances where water systems are allowed to identify alternate monitoring locations.

Alternate monitoring locations allowed:

1. **Coliform & distribution system disinfectant residuals:** CWSs must continue to collect the minimum # samples required (as specified in their RTCR/DRR sample siting plans), but alternate locations are allowed if a site is unavailable due to business closures/restricted access.
 - An alternative location may include an outside tap or other location that is lower risk for the sampler. *Extra care and caution for tap cleaning and flushing prior to sampling should be used for any alternative locations.*
 - If the alternate location is within 5 service connections of the unavailable routine location, the sample should be reported using the location ID# of the routine location.
 - If the alternate location is NOT within 5 service connections of the routine sampling site, the CWS should make note of the following on its Monthly Operating Report or other log used by the water system:
 - o Designation of a unique three-digit location ID number between 500 and 699, which will be used for reporting the results to the Department. The sample location ID# of the routine site should not be used.
 - o Description of the sampling location.
 - o Description of the circumstances that required use of an alternate location.
 - o Ensure the chain-of-custody to the lab clearly denotes the sample(s) as compliance samples with the alternate location ID# to enable the lab to correctly report results to DEP.
 - Remember, a disinfectant residual measurement is required for each routine & check sample – use the same 3-digit code to report both results.

- A CWS that voluntarily identified more than the minimum # sites required by population in the RCTR Sample Siting Plan as the normal sampling *may* reduce the monthly number to the minimum # specified in regulation. The PWS does not need to formally revise their sample siting plan - just notify the district/region in an email: how many samples will be collected, at which sites samples will *not* be collected, and confirm that monitoring is representative of the entire distribution system. Once restrictions have been lifted, the PWS will either need to return to normal sampling or formally update their RCTR plan with the reduced number. *This option does not apply to a CWS that identified more sites than the minimum # required by population to ensure adequate representation of the distribution system (because portions are physically or hydraulically separate and additional samples are needed to capture all water quality).*
 - CWSs may re-sample at existing locations as long as the sampling is distributed evenly across the month and there continues to be sufficient representation of sampling sites throughout the distribution system. For cases where the same site is sampled more than once, the existing location ID# should still be used.
 - Three (3) check samples are required for all coliform-positive results. As much as possible, check samples are to be taken in accordance with RCTR requirements. However, if appropriate check sample locations are not available, the CWS may sample within the affected building using the routine sampling tap and sampling from upstream & downstream taps within the same building. If this option is determined to be necessary, the CWS may NOT request sample invalidation stating the coliform contamination is limited to a single service connection (as noted under § 109.301(3)(iii)). The CWS must also document the reasons for sampling within the same building.
2. **TTHM/HAA5 (DBPs):** Alternate sampling locations are allowed if routine sites are unavailable due to business closures/restricted access. However, if the routine location is not available during the 7-day window specified in the monitoring plan, but is available sometime during that same calendar month, the CWS should sample from the identified routine location within the same calendar month. If the routine location is unavailable during the calendar month identified in the monitoring plan, the CWS should select an alternate location.
- If the alternate location is representative of the same water as the unavailable location, use the same location ID as the routine sample site identified in the monitoring plan.
 - If there are no alternate locations available that are representative of the same water, the CWS needs to identify an alternate site that is representative of a high TTHM location or high HAA5 location. If the routine location was identified as a high TTHM site, an alternate site should be selected that is also representative of a high TTHM location; conversely, if the routine location was identified as a high HAA5 site, an alternate site should be selected that is also representative of a high HAA5 location. The CWS should make note of the following on its Monthly Operating Report or other log used by the water system:

- o Designation of a unique three-digit location ID number between 500 and 699, which will be used for reporting the results to the Department. The sample location ID# of the routine site should not be used.
- o Description of the sampling location.
- o Description of the circumstances that required use of an alternate location.
- o Ensure the chain-of custody to the lab clearly denotes the sample(s) as compliance samples with the alternate location ID# to enable the lab to correctly report results to DEP.

Additional guidance on how to identify a high TTHM or high HAA5 alternate sampling location can be found in the [Stage 2 DBPR training materials \(pages 6-4 and 6-5\).](#)

Within 48 hours after having to collect coliform, disinfectant residual or DBP samples from an alternate location, the CWS should notify its local DEP Safe Drinking Water staff in writing (via email) to explain the circumstances that required use of an alternate location. If you do not have an email address for the local DEP SDW staff, send the notice to the appropriate regional office email address:

SERO: EP-SDW-SERO-Notes@pa.gov

NERO: EP-SDW-NERO-Notes@pa.gov

SCRO: EP-SDW-SCRO-Notes@pa.gov

NCRO: EP-SDW-NCRO-Notes@pa.gov

SWRO: RA-EPSWSDW@pa.gov

NWRO: EP-SDW-NWRO-Notes@pa.gov

If you do not know in which region your PWS is located, please visit this DEP website that identifies which counties are covered by each region: [DEP Regional Offices](#).

Continue to monitor as required:

1. **Nitrate/Nitrite:** Continue to monitor as required (i.e. the required # samples from each entry point at the appropriate monitoring frequency).
2. **Lead & Copper (LCR):** Continue to monitor as required (i.e. the required # samples from highest-risk sites during the appropriate monitoring periods); system operators should be able to maintain social-distancing guidelines while dropping off and picking up LCR tap sample bottles.
3. **IOC/VOC/SOC/RAD:** Continue to monitor as required (i.e. the required # samples from each entry point at the appropriate monitoring frequency).
4. **Performance monitoring specified in a permit (to ensure treatment efficacy):** Continue to monitor as required (i.e. the required # samples from each specified location (plant tap and/or entry point) at the appropriate monitoring frequency).

Finally, DEP understands this evolving situation has the potential to affect water system operations and the availability of key staff. If you begin to experience any circumstances that may adversely affect water quality or quantity, please contact DEP using the list of emergency response contact numbers at the following webpage: <https://www.dep.pa.gov/About/ReportanIncident/Pages/default.aspx>.

DEP will continue to assess the situation on a regular basis and will update you if modifications to this guidance are necessary.

If you have any questions, please contact the BSDW Operations Section at RA-EPSDWOPSSECTION@pa.gov. Please be as specific as possible in the information you are requesting so that we can direct the request to the appropriate staff person.