

DEP Safe Drinking Water Notifications and Alternate Coliform Sampling Locations

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

Due to the closure of Commonwealth offices, we are requesting that you submit certain SDW information to DEP via email for the duration of this closure. *Please pay careful attention as there are different email addresses for each type of submission.*

1. The 24-hour written notice required under §109.810(b) whenever a sample result exceeds an MCL, MRDL or a treatment technique performance requirement, any individual tap sample result exceeds the Pb/Cu action level, or a sample result requires the collection of check or confirmation samples, should be sent to the appropriate **Regional** email address noted below:

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

Out-of-State Bottled Water Systems: RA-EPSDWOPSSECTION@pa.gov

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

2. If you need to submit DWELR correction requests, please email the documentation to **EP, PADWIS** at ra-padwis@pa.gov.
3. If you are experiencing limitations in your capacity to analyze drinking water samples caused by staffing or supply issues or you need to shut-down your operations, please notify the **BSDW Operations Section** at RA-EPSDWOPSSECTION@pa.gov. If you are limited in capacity, please provide as much detail as to what samples you can and cannot continue to process.
4. Labs are likely getting questions about, or are experiencing problems in, accessing routine sampling locations for routine coliform and disinfectant residual compliance monitoring. The information below was also sent to all CWSs. NCWSs facilities that are not operating are not expected to conduct routine compliance monitoring while closed.

Water systems must continue to collect bacteria samples as required. However, due to unfolding events, this message provides instructions regarding **temporary flexibility** for collecting samples at alternate locations for **total coliform and E. coli** as required under the Revised Total Coliform Rule and for **disinfectant residual monitoring in the distribution system** as required under the Disinfection Requirement Rule and the Disinfectants and Disinfection Byproducts Rule.

If a routine distribution location is unavailable due to a quarantine or other restriction directly related to the ongoing business closures and social-distancing:

- The CWS may identify an alternate sampling location that is most representative of the water quality at the unavailable routine location. In the absence of specific data, it is recommended that the closest available location be used. An alternative location can 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.* Note that coliform-positive results and any follow-up actions required because of positive results (such as Assessments) will **not** be invalidated as a result of using an alternate location.
- The CWS may collect samples at the alternate site in lieu of collecting samples at the routine location. Samples should be collected at the same frequency that they would be collected from the routine location.
- If the alternate location is within 5 service connections of the 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 Description of the sampling location.
 - 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 circumstances that required use of an alternate location.
- By the 10th of the following month, report all of the data to DWELR as you normally would for any month. When reporting results for alternate locations on the SDWA forms, be sure to use the three digit location ID number between 500 and 699 that you assigned to the alternative location.
- 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 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 RTRC

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.

- Within 48 hours after having to begin routine or check sampling 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 (the accredited lab) are collecting routine samples on behalf of a CWS, you will need to notify and coordinate with the CWS's responsible official if you need to identify an alternate sampling location.** The CWS is responsible for notifying DEP of changes to sampling locations.

At this time, this flexibility only applies to total coliform, *E. coli* and disinfectant residual monitoring in the distribution system. This flexibility is for a limited duration; DEP will notify you when this flexibility is no longer available.

5. 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.