Revised Total Coliform Rule (RTCR) Regulatory Update

Southeast AWWA Meeting
March 16, 2017

Tom Wolf, Governor
Patrick McDonnell, Acting Secretary
What We’ll Discuss

• Timeline of the history of the rule
• Compliance with key provisions
• Training update
• RTCR website overview
• Updates to RTCR related documents
Final EPA Rule Published: February 13, 2013

EPA Rule Effective: April 1, 2016

Final PA Rule Published: September 24, 2016

Primacy Package Submitted: February 13, 2017
Sample Siting Plans

• Widespread training conducted by DEP in 2015 in an effort to have plans submitted prior to 4/1/16.

• Current compliance: 8287 plans submitted out of 8511 water systems

• 97% compliance
 seasonal water systems only: widespread training conducted by DEP in 2015 in an effort to have plans submitted prior to 4/1/16.

– Systems which opened prior to 4/1/16 had until 30 days after 9/24/16.

• Current compliance: 960 plans submitted out of 999 seasonal water systems

• 96% compliance
Monthly Monitoring

• New requirement for Noncommunity water systems

• During interim period prior to PA rule (4/1/16 to 9/24/16) EPA enforced monthly monitoring.

• EPA sent 195 administrative orders to water systems that failed to monitor for more than one month.

  – Once PA rule effective DEP took over enforcement
Assessments

• New Requirement: Find and fix approach, purpose is to find sanitary defects and sampling issues and fix them

• Statewide training on Level 1 Assessments and RTCR compliance in 2016

• From April 1, 2016 through January 31, 2017
  – 660 Level 1 Assessments triggered
  – 305 Level 2 Assessments triggered
Level 1 Assessments by System Type

Key

**CWS**: Community Water System

**NTNC**: Nontransient Noncommunity

**TNC**: Transient Noncommunity

[Diagram showing pie chart with percentages for CWS, NTNC, and TNC]
Level 2 Assessments by System Type

Key

CWS: Community Water System

NTNC: Nontransient Noncommunity

TNC: Transient Noncommunity
Corrective Actions:

- Every sanitary defect is required to have a corrective action and completion schedule.

- Corrective Actions Taken from 4/1/16 - 1/31/17
  - Completed: 591

- Corrective action categories:
  - Source, treatment, distribution system, system management and operation, monitoring and reporting, water storage, & pumps
Corrective Actions Taken by Category

<table>
<thead>
<tr>
<th>Corrective Action Category</th>
<th>Source</th>
<th>Treatment</th>
<th>Distribution System</th>
<th>System Management and Operation</th>
<th>Monitoring/Reporting</th>
<th>Water Storage</th>
<th>Pumps</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrective Actions Taken by Category</td>
<td>285</td>
<td>147</td>
<td>113</td>
<td>19</td>
<td>13</td>
<td>12</td>
<td>2</td>
</tr>
<tr>
<td>Percent by Category</td>
<td>48%</td>
<td>25%</td>
<td>19%</td>
<td>3%</td>
<td>2%</td>
<td>2%</td>
<td>1%</td>
</tr>
</tbody>
</table>
Level 2 Assessments

• Must be conducted by a properly certified operator
  – Class
  – Subclass

• Transient Noncommunity water systems are not required to have an operator for daily operation
  – Will need to hire an operator to conduct Level 2 Assessments

• Are larger water systems OK with their operators working off hours/part time conducting assessments?
Operator Responsibilities

• Conducting an assessment does NOT mean that the operator is hanging their license at the facility

• Record violations and corrective actions on the assessment form

• Inform water systems when an imminent health threat exists and that the water system should contact DEP within one hour
Level 2 Assessments

• Operators interested in conducting Level 2 Assessments at TNC:
  – Complete Assessment Operator Survey:  

• List of names by county posted to RTCR website
  – Updated quarterly
Training

• Detailed training on how to conduct Level 2 Assessments in 2017

• DEP regions are beginning to conduct Level 2 Assessment training

• Trainings scheduled for March and April in two regions, additional trainings throughout Spring

• RTCR training posted on the RTCR website
RTCR Website

Link:  http://tinyurl.com/PaRTCR2

OR

www.dep.pa.gov then go to Businesses Tab > Water

• Select Bureau of Safe Drinking Water from right side bar (3rd option)
• Select Drinking Water Management from right side bar (4th option)
• Select Regulations from right side bar (1st option)
• Select Revised Total Coliform Rule from right side bar (10th option)
Website Contents

• PA RTCR final rule publication in PA Bulletin
• RTCR Webinar for Systems, Operators & Consultants
• Training dates and information
• Specific information on assessments, sample siting plans and seasonal systems including:
  – Templates
  – How to find an assessor for systems without an operator
  – YouTube Tutorials on how to complete sample siting plans and a Level 1 Assessment
RTCR Additional Notes

• RTCR Technical Guidance Document in the process of being published as draft for public comment
  – Expect public comment period begin no later than July 1\textsuperscript{st}

• Public Notice (PN) templates for RTCR are updated and posted to \textit{eLibrary} under Safe Drinking Water Forms (Tier 1, Tier 2 & Tier 3 PN)

http://www.elibrary.dep.state.pa.us/dsweb/HomePage
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