



Bureau of Safe Drinking Water

# **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



# Regulation Timeline

**Final EPA Rule Published:** February 13, 2013

**EPA Rule Effective:** April 1, 2016



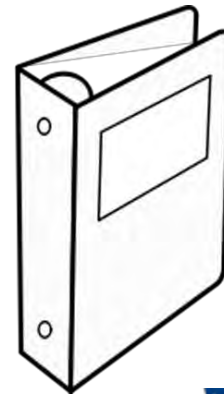
**Final PA Rule Published:** September 24, 2016

**Primacy Package Submitted:** February 13, 2017

# Key Provisions

## 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



# Key Provisions

## Seasonal Start-Up Plans

- *For 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

# Key Provisions

## Monthly Monitoring

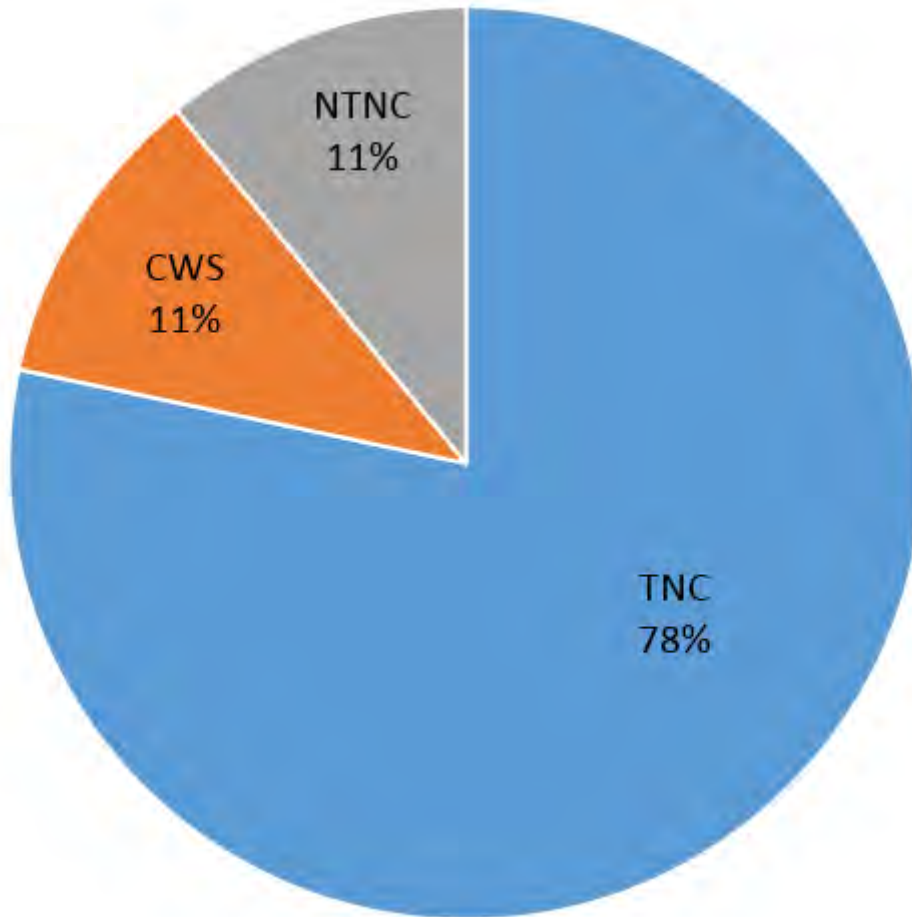
- New requirement for Noncommunity water systems
- During interim period prior to PA rule (4/1/16 to 9/24/16) EPA enforced monthly monitoring.
- EPA sent 195 administrative orders to water systems that failed to monitor for more than one month.
  - Once PA rule effective DEP took over enforcement

# Key Provisions

## 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

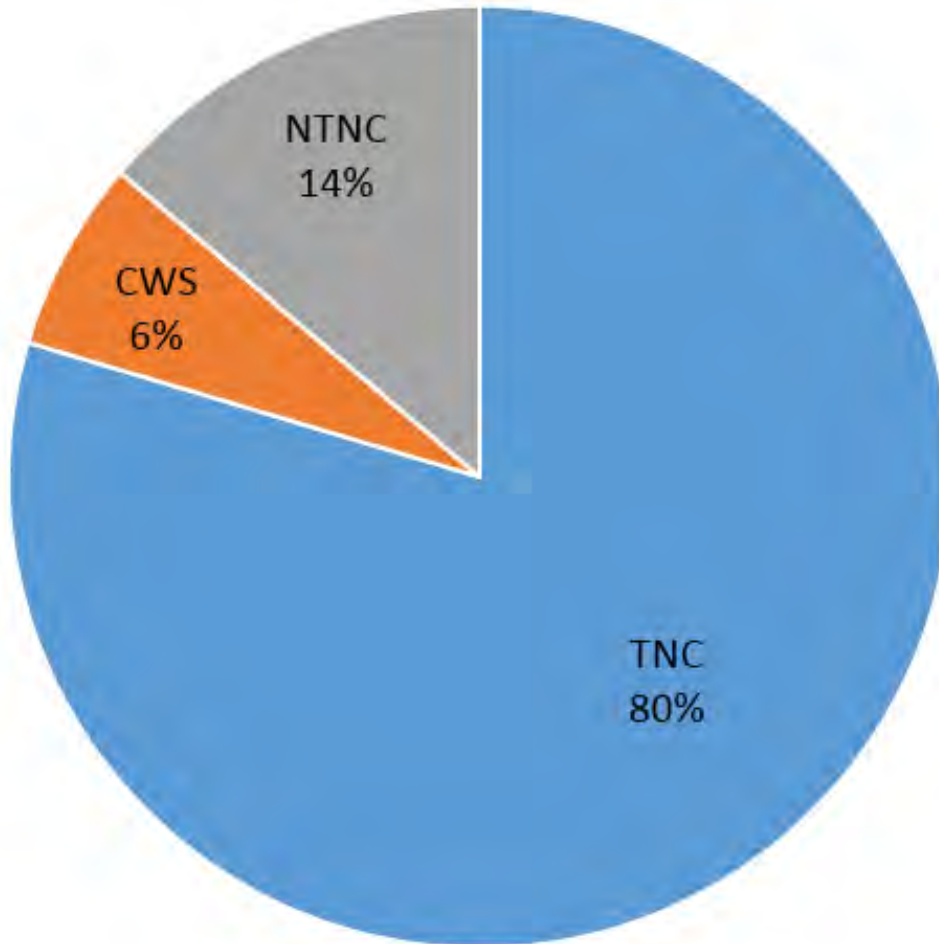
**CWS:**  
Community  
Water System

**NTNC:**  
Nontransient  
Noncommunity

**TNC:**  
Transient  
Noncommunity



# Level 2 Assessments by System Type



## Key

**CWS:**  
Community  
Water System

**NTNC:**  
Nontransient  
Noncommunity

**TNC:**  
Transient  
Noncommunity

# Corrective Actions

## 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

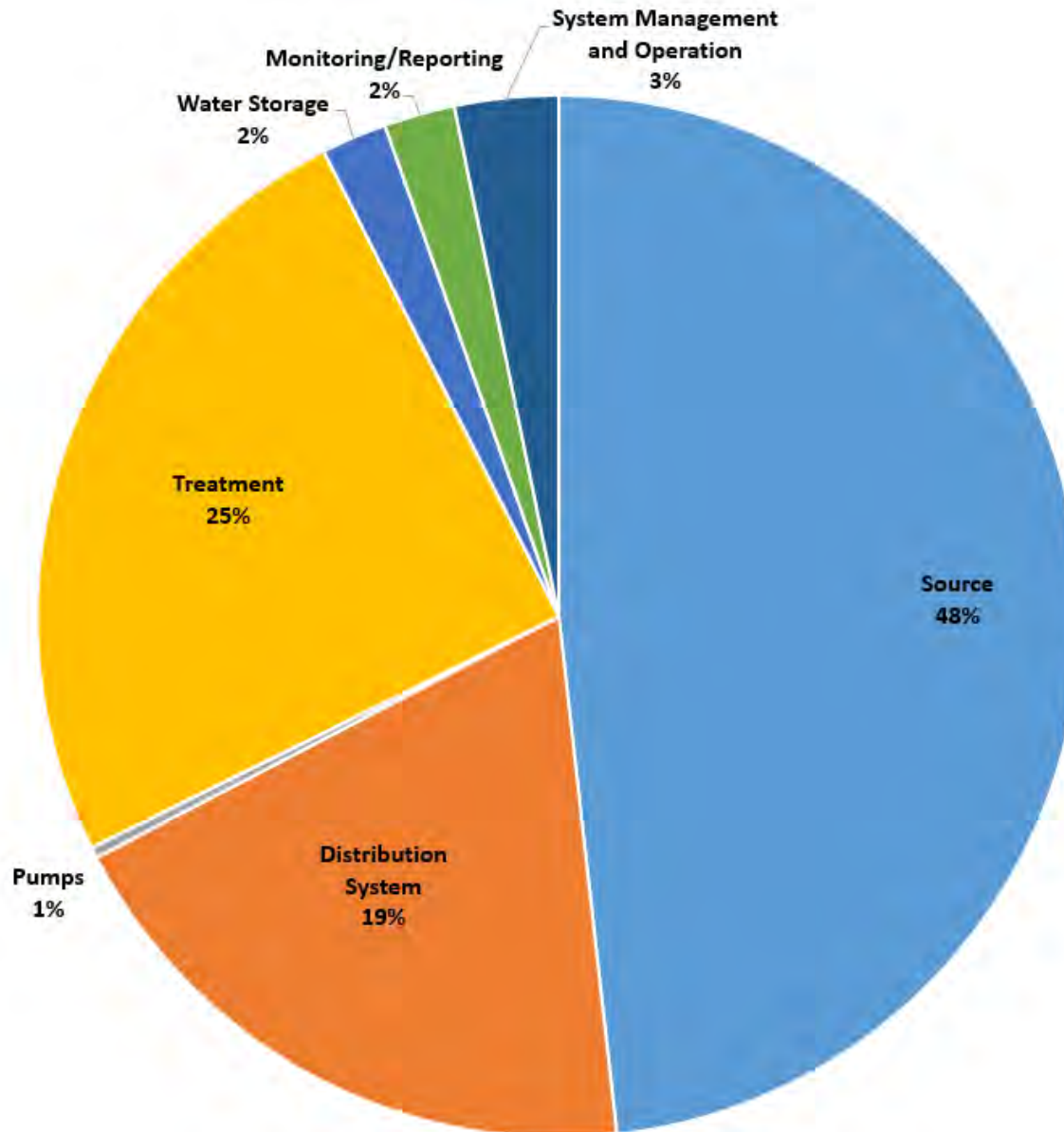
# Corrective Actions

## Corrective Actions Taken by Category

Corrective Action Category	Source	Treatment	Distribution System	System Management and Operation	Monitoring/Reporting	Water Storage	Pumps
Corrective Actions Taken by Category	285	147	113	19	13	12	2
Percent by Category	48%	25%	19%	3%	2%	2%	1%



# Corrective Action Categories



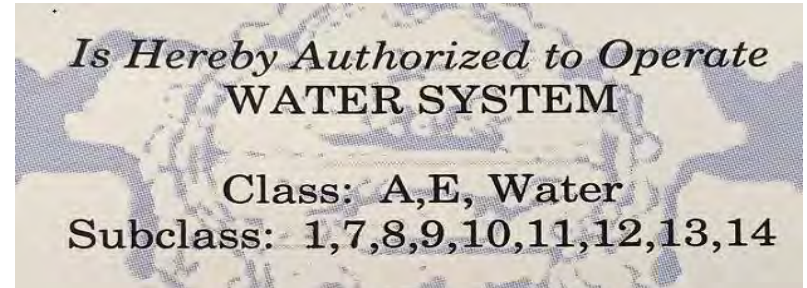
# Level 2 Assessments

- 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?**

# Level 2 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:  
<http://www.surveygizmo.com/s3/3126489/RTCR-Level-2-Assessment-Operator>
- List of names by county posted to RTCR website
  - Updated quarterly





# Level 2 Assessments

## 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](http://www.dep.pa.gov) then go to Businesses Tab > Water

- Select Bureau of Safe Drinking Water from right side bar (3<sup>rd</sup> option)
- Select Drinking Water Management from right side bar (4<sup>th</sup> option)
- Select Regulations from right side bar (1<sup>st</sup> option)
- Select Revised Total Coliform Rule from right side bar (10<sup>th</sup> option)

# RTCR Website

## 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

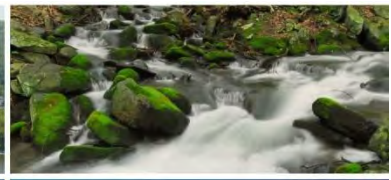
# RTCR Additional Notes

- 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<sup>st</sup>
- Public Notice (PN) templates for RTCR are updated and posted to *eLibrary* under Safe Drinking Water Forms (Tier 1, Tier 2 & Tier 3 PN)

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



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Safe Drinking Water

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