

# RTCR

## Implementation of Level 1 and Level 2 Assessments

*A Workshop for New England Utilities*

**December 01, 2014**

# RTCR Level 1 Assessment

# Level 1 Assessment

## Triggers :

The monthly TC violation under the TCR becomes an assessment trigger under the RTCR

- For a system collecting at least 40 samples per month, more than 5% of samples collected are TC (+)
- For a system collecting fewer than 40 samples per month, more than one sample is TC (+)
- **NEW:** The PWS fails to take every required repeat sample after any single routine TC (+)

## Assessment:

- A basic examination of the source water, treatment, distribution system and relevant operational practices
- Conducted by the PWS

# RTCR Level 2 Assessment

# Level 2 Assessment

## *Triggers:*

### ➤ Violation of the E. coli MCL

- The system has an E. coli (+) repeat sample following a TC (+) routine sample
- The system has a TC (+) repeat sample following an E. coli (+) routine sample
- The system fails to test for E. coli when any repeat sample tests (+) for TC
- The system fails to take all repeat samples following a routine E. coli positive sample

### ➤ Two Level 1 triggers in a 12 month period.

- The exception to this trigger is if the state has determined a likely reason for the TC+ samples that caused the initial Level 1 TT trigger, and the state establishes that the system has fully corrected the problem.



# Level 2 Assessment (continued)

## Assessment:

- **A more in-depth examination of the system and also of its monitoring and operational practices**
  
- **Conducted by the State or a party approved by the State\***
  - ❖ **State certified operator**
  - ❖ **Professional Engineer (PE) licensed and having experience in the regulation of systems in the State of Connecticut.**
  
- **Must have completed minimum 6 hours of level 2 assessment training course with the other supportive documents.**

# RTCR

# Monitoring

# Requirements

# Monitoring Requirements

## Community Water System

❖ **Serving 1000 or fewer people using only ground water**

Routine Monitoring	Reduction
Monthly	Quarterly

**Serving more than 1000 people using only ground water**

Routine Monitoring	Reduction
Monthly	NA

**All Public Water System under the direct influence of Surface Water**

Routine Monitoring	Reduction
Monthly	NA

# Monitoring Requirements

## Non Community Water System

Routine Monitoring	Reduction
Quarterly	NA

## Non community water system on Increase monitoring

Routine Monitoring	Reduction
Quarterly	Monthly

### When Public Water System

- i. Triggers a level 2 assessment or Two Level 1 assessments in a rolling 12-month period;
- ii. Has an E. coli MCL violation;
- iii. Has a coliform treatment technique violation;
- iv. Has Two Monitoring violation or has one monitoring violation and one level 1 assessment in a rolling 12 – month period.

# Seasonal Water System

- Seasonal PWS is defined as a non-community water system that is not operated as a public water system on a year-round basis and starts up at the beginning and shuts down by depressurizing and dewatering all or a portion of its distribution system at the end of each operating season
- **Seasonal PWS must demonstrate completion of a State-approved start up procedure before serving water to public.**
- Before serving to the public, Such water shall be tested for total coliform bacteria, nitrate and nitrite. Such system that is a seasonal system shall not serve water to the public until all such samples are total coliform-negative and do not exceed the MCLs for nitrate and nitrite

# Monitoring Requirements

## Seasonal Water System

**Non Community Water System using only ground water and  
 Serving 1000 or fewer people**

Routine Monitoring	Reduction
Monthly	Quarterly

**Community Water System using only ground water**

Routine Monitoring	Reduction
Monthly	NA

**All Public Water System under the direct influence of Surface Water**

Routine Monitoring	Reduction
Monthly	NA

# RTCR

# Violations

# Violations

## Four different types of violations:

- **E.Coli MCL violation**
- **Treatment technique violation**
  - **A system fails to conduct a required Level 1 or Level 2 assessment within 30 days of learning of the trigger.**
  - **A system fails to correct any sanitary defect found through either a Level 1 or 2 assessment within 30 days of learning of the trigger or in accordance with a schedule approved by the state.**
  - **A seasonal system fails to complete state-approved start-up procedures prior to serving water to the public.**

# Violations (continued)

- **Monitoring violation**

- A system's failure to take every required routine or additional routine sample in a compliance period.
- A system's failure to analyze for E. coli following a total coliform-positive routine sample.

- **Reporting violation**

- failure to submit a monitoring report or completed assessment form after a system properly conducts monitoring or an assessment in a timely manner.
- failure to notify the state, in a timely manner, following an EC+ sample.
- failure to submit certification of completion of state-approved start-up procedures by a seasonal system.

# RTCR Public Notification



# Public Notification

Each violation requires a different level of response and public notification.

- Public Notification is no longer required for total coliform (TC) -positive results alone because many of the organisms detected by the total coliform methods are not of fecal origin and do not have any direct public health implication.

## PN required:

Violation Type	PN Tier
<b>E. coli MCL Violation</b>	<b>Tier 1 (24 hours)</b>
<b>TT Violation</b>	<b>Tier 2 (30 Days)</b>
<b>Monitoring Violation</b>	<b>Tier 3 (365 days)</b>
<b>Reporting Violation</b>	<b>Tier 3 (365 days)</b>

# Thank You

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