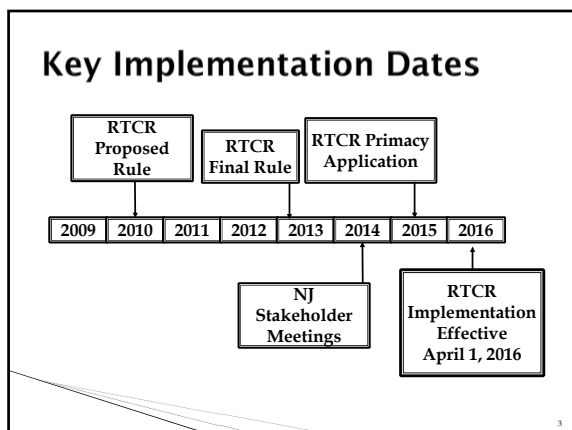


RTCR Rule Update

**Lab Roundtable
October 2016**

Purpose of the RTCR

- Transition TC as an indicator of potential pathways to contamination, not public health
- Improve public health protection by implementing a program that requires the identification and correction of sanitary defects
- Reserve PN for those instances where there is an imminent risk



Reminders: RTCR Monitoring Requirements

RTCR

RTCR Baseline Monitoring

- ▶ Maintains routine sampling schedule of the (1989) TCR with few exceptions
 - All community water systems monitoring monthly
 - Most non-seasonal non-community water systems monitor quarterly
- ▶ Seasonal systems are required to monitor monthly (previously quarterly)
- ▶ Small problem systems are required to conduct increased monitoring
- ▶ NJ does not allow reduced monitoring

Additional Routine Monitoring

- ▶ Systems sampling quarterly must collect a minimum of 3 routine samples the month following a routine TC+ result

This requirement does not apply to systems on monthly monitoring

Increased Monitoring

- ▶ Level 2 assessment
- ▶ Two Level 1 assessments within past 12 months
- ▶ *E. coli* MCL violation
- ▶ Coliform Treatment Technique Violation
- ▶ Two monitoring violations under the RTCR within past 12 months
- ▶ One monitoring violation under the RTCR and one Level 1 assessment trigger within past 12 months

One Sample per Month

Increased Monitoring: When Can I Return to Quarterly?

Over the past 12 months:

- ▶ Completed Sanitary Survey or Level 2 assessment, be free of sanitary defects, and have a protected water source
- AND
- ▶ Clean compliance history

Number of Repeat Samples

- ▶ 3 repeat samples for *each* routine TC+
 - Within 24 hours of being notified of the TC+ result

NJDEP will no longer allow source water dual purpose samples

Also note that. . .

- ▶ **Monitoring** and **Reporting** (M&R) violations will be tracked separately.
- ▶ BOTH will require Tier 3 PN
- ▶ Failure to submit completed assessment forms or certification of seasonal start-up procedures are **reporting** violations.
- ▶ Failure to analyze for *E. coli* (not fecal) following a TC+ is a **monitoring** violation.

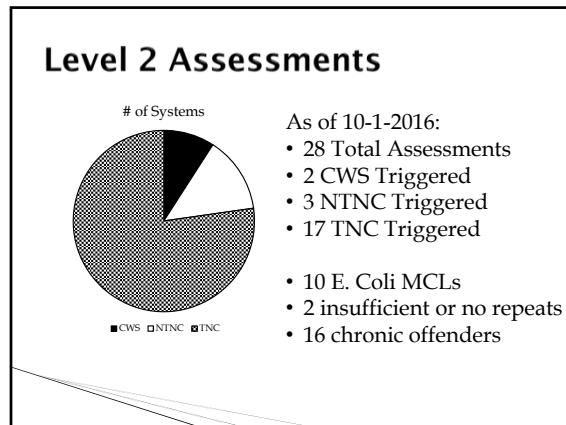
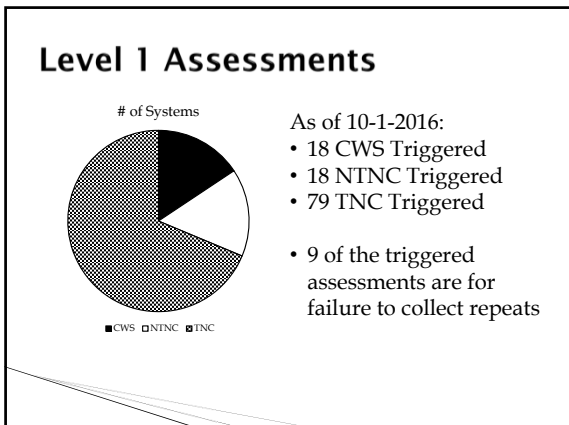
**Assessments &
Corrective Action**

RTCR



Investigation of Sanitary Defects

- ▶ When monitoring results show vulnerability to contamination, water systems must investigate and correct sanitary defects.
 - Level 1 assessment (basic, self-assessment)
 - Level 2 assessment (detailed)
- ▶ Level of assessment is based on the severity and frequency of potential contamination



NOTE:

- ▶ Assessment forms do include a section on sampling protocol that the water system is required to review.

Seasonal System Requirements

RTCR

Seasonal Systems

- ▶ A seasonal system is a NCWS, not operated as a PWS on a year-round basis, that starts up/shuts down at the beginning & end of each operating season
- ▶ There are approximately 480 seasonal water systems in New Jersey that are required to monitor monthly

I'm a seasonal system, can I switch to an annual schedule to avoid monthly monitoring?

» NO! Seasonal systems cannot decide to monitor year round to avoid monthly monitoring.

Even a system that remains pressurized may be subject to water quality degradation due to stagnant water or loss of disinfectant residual.

Start-up Procedures

- ▶ Collection of a start-up sample no more than 30 days prior to opening
- ▶ Completion of start-up certification form
- ▶ Corrective action if start-up sample is confirmed to be EC+
- ▶ Start-up sample can count for compliance sample if it is in the same month system opens and collected prior to opening

Why is the Start up date so important?

- » Compliance with the start-up requirements are based on the operational dates provided during inspections.

Start-up Compliance

- ▶ Approximately 160 Systems have **NOT** submitted a start-up certification for 2016
- ▶ These system will receive a **VIOLATION**

Other Key Notes

RTCR

Rotating Sampling Sites

- ▶ A non-community water system with a large distribution system should:
 - Sample a different location per month/quarter
 - Can keep the same repeat locations
 - Recommendation for systems with multiple buildings



24 & 48 Hour Reporting

- ▶ by the end of the day in which the system learns of:
 - *E.coli* routine positive result
 - *E. coli* MCL violation
- ▶ By the end of the next business day after system learns of:
 - Treatment technique violation

RTCR Factsheets

(RTCR)

FACTSHEET: Revised Total Coliform Rule

Requirements for Small Systems on Monthly Monitoring


WHO DOES THIS FACTSHEET APPLY TO?
All public water systems (PWS), regardless of source, that serve 1,000 people or more and collect at least one routine total coliform (TC) sample monthly.

RTCR What to do?

STEP 1: Develop/update your sample siting plan.

STEP 2: Collect your drinking water samples.

STEP 3: Conduct required actions.



ADDITIONAL ACTION POINTS:

- Requirement for Small Systems on Quarterly Annual Monitoring

ATTENTION:

All PWSs must comply with the RTCR requirements starting April 1, 2016. [View your PWS's Contact your state at \[PWScontactfor state info/web site\]](#)

STEP 1: DEVELOP/UPDATE YOUR SAMPLE SITING PLAN*

Contact your state for assistance.

- Develop a sample siting plan and need a ready-to-use by April 1, 2016. If you already have a sample siting plan for the Total Coliform Rule (TCR), update this plan to meet the requirements of the RTCR.
- Let the locations where you will test your samples (source and service).
- Any needed sampling location that is also used for DWR triggered source water monitoring must be included.
- Include your routine collection schedule. For example, "[PWS_ID] will collect one routine total coliform sample every 30th minute of the calendar month."
- Sample to easily conduct at your PWS. The sample siting plan is a living document and should be updated to reflect changes at your PWS such as major changes in population, a new or additional water source.

▶ Suggestions?

Questions?



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