



**Primacy Considerations:
Seasonal Systems**

- ▶ State must describe how it will:
 1. Identify seasonal systems
 2. Evaluate if start up procedures have been completed



Federal Definition

- ▶ 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

Important Notes!

- ▶ A NCWS may be considered a seasonal system if:
 - The system remains pressurized but does not serve the public on a year round basis
 - or**
 - The system depressurizes a portion of the system for a part of the year

Identification

- ▶ NTNC & TNC systems
- ▶ 487 that currently have TCR monitoring schedules less than 12 months of year
- ▶ Outreach to determine if system depressurizes
- ▶ Additional outreach to systems monitoring year round (parks, etc.)

Seasonal System Monitoring Requirements

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Requirements for Seasonal Systems

- ▶ Must monitor monthly for all months they are in operation, unless it meets reduced monitoring criteria (seasonal GW Systems < 1,000 people)
- ▶ NJ State rules do not allow for reduced monitoring provisions under the rule (discussed in June 2014 Stakeholder meeting)

I'm a seasonal system, can I switch to a full year of quarterly monitoring 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

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Start-up Procedures

- ▶ Beginning April 1, 2016, all seasonal systems must demonstrate completion of a state-approved startup procedure before serving water to the public
- ▶ States have the flexibility to determine what start-up procedures are appropriate for a particular system based on site-specific considerations
- ▶ States may require one or more TC samples as part of the required start-up procedures

Special Exemption

- ▶ State may exempt seasonal systems from start-up requirements of RTCR if the distribution system remains pressurized during the entire period that the system is not operating

Examples of Start-up Procedures

- Disinfection and Flushing
- Sampling for total coliform/E. coli
- Minimum disinfectant residual in distribution system
- Site visit by state or state-approved third party
- Verification that any current or historical sanitary defects from previous operational period have been corrected

States have discretion to allow any combination of procedures or additional procedures not listed here.

What other states are doing. . .

- New Hampshire
 - Wellhead protective area
 - Assessment of well house, well & sample taps
 - Minimum overnight chlorination at 50 mg/l
 - Start-up bacteria sample
- Maine
 - Well inspection
 - Disinfection & flushing
 - Start-up bacteria sample 1 week after above

Highlight – September 2014 Stakeholder Meetings

- ▶ Start-up bacteria sample from the portion of the system that was depressurized or other State approved location
- ▶ Timeframes to address deficiencies

Create best practice fact sheet for seasonal systems prior to start-up

What this means for NJ

- ▶ All seasonal water systems must:
 1. Collect a start-up sample no more than 30 days prior to opening
 2. Submit a certification of completion prior to serving water to the public that includes:
 - System Name
 - Date of opening
 - Start-up sample results
 - Sample ID #

Why is the Start up date so important?

- » Compliance with the start-up requirement is based on the operational dates provided during inspections.

Can I use the start-up sample to satisfy routine monitoring requirements?

- » Yes, a start-up sample can be used to satisfy the routine monitoring requirements provided the sample is collected prior to serving water to the public and in the same month that the system opens

Example

- ▶ Opening date: 5/15
 - Must collect a start up sample between 4/15 and 5/14 (30 days prior to opening)
 - Must collect a routine sample between 5/1 and 5/31
 - A sample collected 5/10 can be used to satisfy routine monitoring schedule
 - A sample collected 4/27 shall not be used to satisfy routine monitoring schedule (not in the same month)

Note!

- ▶ A TC+ or EC+ sample used as both a start-up and routine compliance sample will trigger the treatment technique requirements of the rule.
- ▶ It is important to collect a start-up sample with time to resolve the issue and collect a clean sample prior to opening.

More Notes!

- ▶ Start-up Samples should only be submitted via E2 if they are also being used to satisfy the routine monthly schedule
- ▶ Sample ID # should include a tag at the end "SSUP" to identify as a start-up and routine sample

Violations

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Seasonal System Violations

- ▶ TT violations
 - Failure to complete state-approved start-up procedures prior to serving water to the public
- ▶ Reporting violations
 - Failure to submit certification of completion of start-up procedures

Did you know?



Drinkable Book cleans murky water

- ▶ Combines treated paper with printed information on how and why water should be filtered.
- ▶ Trials at 25 contaminated water sources in South Africa, Ghana and Bangladesh, successfully removed more than 99% of bacteria.
- ▶ The resulting levels of contamination are similar to US tap water
- ▶ A book could filter one person's water supply for four years.

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