



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Safe Drinking Water

RTCR Assessments: *Pre-Draft* Forms

**Technical Advisory Committee
for Small Water Systems Meeting**

Sept. 23, 2014

Objectives

- Review and discuss the pre-draft Level 1 and Level 2 Assessment Forms
- Solicit comments on the pre-draft Level 1 and Level 2 Assessment Forms

RTCR – Level 1 Assessment

Level 1 treatment technique triggers as specified in **40 CFR 141.859**

- “For systems taking 40 or more samples, the system exceeds 5 percent total coliform-positive samples for the month.”
- “For systems taking fewer than 40 samples per month, the system has two or more total coliform-positive samples in the same month.”
- “The system fails to take every required repeat sample after any single total coliform-positive sample.”

RTCR – Level 1 Assessment

40 CFR 141.2

“A *Level 1 assessment* is an evaluation to identify the possible presence of sanitary defects, defects in distribution system coliform monitoring practices and (when possible) the likely reason that the system triggered the assessment. It is conducted by the system operator or owner.”

RTCR – Level 1 Assessment

40 CFR 141.2 Level 1 Assessment

“Minimum elements include:

- review and identification of atypical events that could affect distributed water quality or indicate that distributed water quality was impaired;
- changes in distribution system maintenance and operation that could affect distributed water quality (including water storage);
- source and treatment considerations that bear on distributed water quality, where appropriate (e.g., whether a ground water system is disinfected);
- existing water quality monitoring data; and
- inadequacies in sample sites, sampling protocol, and sample processing.”

RTCR – Level 1 Assessment

40 CFR 141.2 Level 1 Assessment

“The system must conduct the assessment consistent with any State directives that tailor specific assessment elements with respect to the size and type of the system and the size, type, and characteristics of the distribution system.”

RTCR – Level 2 Assessment

Level 2 treatment technique triggers as specified in **40 CFR 141.859**

- “An *E. coli* MCL violation”
- A second Level 1 trigger within a rolling 12-month period

RTCR – Level 2 Assessment

40 CFR 141.2

A *Level 2 assessment* includes all of the same requirements and elements of a Level 1 assessment, but a Level 2 assessment provides a more detailed examination of the system (including the system's monitoring and operational practices) through the use of more comprehensive investigation and review of available information, additional internal and external resources and other relevant practices.

RTCR – Level 2 Assessment

40 CFR 141.2

A Level 2 assessment is “conducted by an individual approved by the State, which may include the system operator.”

“The system must conduct the assessment consistent with any State directives that tailor specific assessment elements with respect to the size and type of the system and the size, type, and characteristics of the distribution system. The system must comply with any expedited actions or additional actions required by the State in the case of an *E. coli* MCL violation.”

RTCR – Assessments

40 CFR 141.2 - “A *sanitary defect* is a defect that could provide a pathway of entry for microbial contamination into the distribution system or that is indicative of a failure or imminent failure in a barrier that is already in place.”

Under **40 CFR 142.16** - *Special Primacy Requirements*, states must “include an explanation of how the State will ensure that Level 2 assessments provide a more detailed examination of the system (including the system’s monitoring and operational practices) than do Level 1 assessments through the use of more comprehensive investigation and review of available information, additional internal and external resources, and other relevant practices.”



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QUESTIONS?

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