



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Safe Drinking Water

# **RTCR**

# ***Pre-Draft* Technical Guidance**

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

**Dec. 17, 2015**

# Objectives

- Review and discuss the ***Pre-Draft*** Technical Guidance
  - Seasonal Water System Start-up Procedure
  - Sanitary Defects
  - General Questions & Comments

# Seasonal Water Systems

RTCR requires all seasonal systems to demonstrate completion of a State-approved start-up procedure

- Page 8 of the pre-draft guidance provides examples from the EPA's RTCR State Implementation Guidance
- Expectation is that each seasonal system's start-up procedure would address the bulleted list found on page 8

# Sanitary Defects

## 40 CFR 141.2

“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.”

# Sanitary Defects

PWS Subfacility	Sanitary Defect
Source	The well is located in a pit.
Source	The well does not have a sanitary seal well cap.
Source	Manure is running into stream immediately upstream of intake.
Treatment	Chlorine day tank had been empty.
Treatment	Failed to provide 4-log treatment of viruses.
Distribution System	A water main break causing negative pressure was identified.
Distribution System	A chlorine residual was not detected.
Storage Tank	A screen is missing on an overflow pipe.

# General Discussion

Are there other questions or comments from the pre-draft document?



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