Final Rulemaking:
Revised Total Coliform Rule
25 Pa. Code Chapter 109

Environmental Quality Board Meeting
June 21, 2016
Background and Purpose

• Incorporate the federal Revised Total Coliform Rule (RTCR) needed to obtain primary enforcement authority (primacy)

• Provide for the increased protection of public health at public water systems (PWS)

• The RTCR applies to all PWSs
Monthly monitoring for all water systems

New requirements for seasonal systems
   – Start-up procedures and additional samples

New assessment requirements – “Find and Fix”
   – Self-assessment (Level 1) or a more detailed assessment (Level 2) depending on the severity and frequency of contamination
   – Replaces current non-acute MCL violation and public notice requirements for total coliforms
Why is it important to find and fix sanitary defects?

• Sanitary defects include low/no disinfectant residual, ineffective O&M practices, waterline breaks/leaks, cross-connections, poor storage tank maintenance practices, etc.

• Sanitary defects can lead to the degradation of drinking water quality, contamination, and waterborne disease outbreaks
Expected Results

Elimination of sanitary defects

• The avoidance of health effects from the consumption of contaminated drinking water

• The provision of a safe and adequate supply of potable water
Expected RTCR costs per system type:

- **CWS**: $126.77 per system/year
- **NTNC**: $128.90 per system/year
- **TNC**: $229.31 per system/year
Public Outreach

• Technical Assistance Center for Small Water Systems (TAC) meetings.
• PA Small Business Compliance Advisory Committee
• 60-day public comment period
• Two public hearings
Identification of repeat monitoring locations

• Within 5 taps on either side of a routine location

• Fixed Alternative Locations

• Standard Operating Procedures for selecting alternative locations will not be allowed
The federal RTCR commenced April 1, 2016
  – Negotiated extension agreement effective through February 2017

Classroom training and web-based training began summer 2015

Technical Guidance Document
DEP recommends that the EQB approve the final-form rulemaking.