



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Safe Drinking Water

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

Significant Provisions: RTCR

- 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

Significant Provisions: RTCR

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 Costs

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

Significant Issues

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

Implementation Strategy

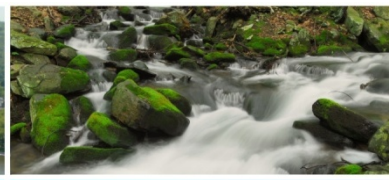
- The federal RTCR commenced April 1, 2016
 - Negotiated extension agreement effective through February 2017
- Classroom training and web-based training began summer 2015
- Technical Guidance Document

Final Rulemaking Recommendation

DEP recommends that the EQB approve the final-form rulemaking.



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