DWS Circular Letter #2014-09

To: CTAWWA, CWWA, CADH, CEHA, DEEP, PURA, DCP, OPM, DOC, DOT, DDS

From: Lori Mathieu, Public Health Section Chief  
Drinking Water Section

Date: May 22, 2014

Subject: Proposed Regulation Amendments to Conform to the Revised Total Coliform Rule- Invite to Informational Meeting and Presentation

The Department of Public Health (DPH) staff will be presenting the highlights of the proposed amendments to Section 19-13-B102 of the Regulations of Connecticut State Agencies (RCSA) at a meeting to be held at DPH at 470 Capitol Avenue, Conference Room “AB”, in Hartford on June 12, 2014 at 1:00 PM. I invite you to attend the meeting if you can, because it’s a great opportunity to hear from the staff and ask any questions you may have relative to the proposal.

As you may or may not know, on February 13, 2013, the U.S. Environmental Protection Agency (EPA) published the Revised Total Coliform Rule (RTCR) in the Federal Register. This rule will apply to all public water systems, and when compliance begins on April 1, 2016, all systems will see changes to how they monitor total coliform and react to total coliform positive samples.

The main goal of the RTCR is to enhance public health protection by identifying the presence of "sanitary defects”, which are defined in the RTCR as a defect that is providing, or has the potential for providing, 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. Systems that exceed the specified number of total coliform occurrences are required to conduct one of two different levels of assessment designed to take a close look at the entire system and its operation to identify any sanitary defects. If any defects are found, the RTCR requires the system to correct them. This is a proactive approach that should lead to the identification and correction of problems that may compromise public health in an effort to reduce cases of illnesses and deaths due to potential fecal contamination and waterborne pathogen exposure.
As a result, the Department of Public Health (DPH) is proposing to amend Section 19-13-B102 of the Regulations of Connecticut State Agencies (RCSA) to conform to the RTCR and to maintain primacy for the State’s implementation and enforcement of the Safe Drinking Water Act (SDWA). The draft of the proposed amendments to the regulation is attached and also can be accessed at:

I encourage you to attend the informational meeting on June 12th, and to provide any written comments you may have to florin.ghisa@ct.gov by June 30, 2014.

Please also visit the DPH – Drinking Water Section (DWS) website for more information and resources concerning the RTCR, or contact the DWS at 860-509-7333.

CC: Local Directors of Health
   Ellen Blaschinski, Branch Chief – DPH Regulatory Services
   Suzanne Blancoflor, Section Chief – DPH Environmental Health Services
   Community Water Systems