

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

Drinking Water Section

DWS Circular Letter #2016-04

TO: Public Water Systems
FROM: Lori Mathieu, Public Health Section Chief, Drinking Water Section
DATE: March 3, 2016
RE: Revised Total Coliform Rule (RTCR)

Handwritten signature of Lori Mathieu.

The Federal Revised Total Coliform Rule (RTCR) takes effect for all public water systems (PWS) on April 1st, 2016. The rule eliminates the Total Coliform Maximum Contaminant Level (MCL) violation, creates an E. coli MCL violation, and introduces a “find and fix” approach to identify and correct sanitary defects that provide pathways for microbial contaminants to enter water systems. The RTCR webpages on our website <http://www.ct.gov/dph/cwp/view.asp?a=3139&q=544350> and on the Environmental Protection Agency website <http://www.epa.gov/dwreginfo/revised-total-coliform-rule-and-total-coliform-rule> provide rule overviews, webinars, quick reference guides, compliance guides specific to PWS size and type, Level 1 and 2 assessment guidance, agency training presentations and other RTCR information to help PWS achieve compliance with the rule.

Sample Siting Plans

The RTCR requires all PWSs to have a Sample Siting Plan (SSP) that identifies sites where samples will be collected to demonstrate compliance with the rule. The selected sampling sites must be representative of water throughout the distribution system. PWSs do not need to submit their SSP to the DPH unless requested to do so. The SSP must be made available to the DPH review upon request and at the time of the system's sanitary survey. PWSs shall collect all routine and repeat RTCR compliance samples in accordance with its SSP.

A document entitled [Total Coliform Rule Sample Siting Plan Requirements](#) is available on the DPH RTCR webpage to help PWSs develop an SSP that meets the minimum requirements. A [Total Coliform Rule Sample Siting Plan Template](#) is also available to help PWSs get started.

Standard Repeat Sampling Locations

A set of three repeat samples must be collected not later than 24 hours after being notified by the laboratory of a positive routine sample result. One repeat sample must be collected from the original routine location, another must be collected from within 5 service connections upstream of the original routine location and the last must be collected within 5 service connections downstream of the original routine location. If a PWS plans to collect repeat total coliform samples from within 5 service connections upstream and 5 service connections downstream, the PWS does not have to identify each individual



Phone: (860) 509-7333 • Fax: (860) 509-7359 • VP: (860) 899-1611
410 Capitol Avenue, P.O. Box 340308, MS#51WAT
Hartford, Connecticut 06134-0308
www.ct.gov/dph/publicdrinkingwater

Affirmative Action/Equal Opportunity Employer

service connection on the Sample Siting Plan. All PWS will have standard upstream and downstream repeat sampling points added to their sampling point inventory as follows:

STANDARD REPEAT SAMPLING LOCATIONS	
Sampling Point ID	Sampling Point Description
UPSTREAM	WITHIN 5 SERVICE CONNECTIONS UPSTREAM
DOWNSTREAM	WITHIN 5 SERVICE CONNECTIONS DOWNSTREAM

PWSs should use the sampling point IDs listed above when reporting results from all repeat sampling locations within 5 service connections upstream or downstream of all original routine sampling locations.

Alternative Fixed Repeat Sampling Locations

A PWS may choose to identify alternative fixed locations for repeat sampling. If alternative fixed locations for repeat sampling are used, a PWS must provide justification that the alternative monitoring locations are: 1) representative of a pathway for contamination of the distribution system; and, 2) that the sample siting plan remains representative of the water quality in the distribution system. For example, a PWS may determine that a sample cannot be collected within 5 service connections upstream due to problems with access to the sample locations. The system can identify specific locations that are more accessible to collect repeat samples outside of the 5 upstream or 5 downstream ranges. Plans that designate alternative repeat sampling locations must be submitted to the DPH on the [Sample Siting Plan with Alternative Repeat Sampling Locations](#) form for review and approval prior to sampling.

Seasonal System Start-up Requirements

A seasonal system is a non-community water system that is not operated as a public water system on a year-round basis and starts up at the beginning and shuts down by depressurizing and dewatering all or a portion of its distribution system at the end of each operating season (i.e. private campgrounds, state parks). Seasonal public water systems will be required to complete a start-up procedure prior to serving water to the public at the beginning of each operating season. The Department has developed [guidelines](#) that provide detailed information on the minimum elements that are required in a seasonal system's start-up procedure and on how to conduct an inspection of a seasonal water system.

After the start-up procedures are complete, seasonal systems must complete and submit the [RTCR Seasonal Start-Up Certification](#) to the Department verifying that the start-up procedures were completed.

The system shall not serve water to the public until the start-up procedure has been completed and the certification has been filed with the Department.

Seasonal System Sampling Plan Requirements

Seasonal PWSs that monitor quarterly must designate the time period or periods for monitoring based on site-specific considerations to include periods of highest demand or highest vulnerability to contamination or prior to major events that may draw more consumers. Seasonal PWSs that monitor quarterly must designate the time period(s) for monitoring on the [Sample Siting Plan for Seasonal Public Water Systems Monitoring Quarterly](#) form and submit the completed form to the DPH for review and approval.

Training Opportunities

New DPH trainings have been scheduled to provide local health personnel and seasonal systems with a better understanding of the RTCR. Trainings supported by the Eastern Highlands Health District, the Uncas Health District, and the Torrington Area Health District will be held from 10:00 am to noon on March 10th, March 18th, and March 23rd, 2016; respectively. A complete list of trainings and locations where the training will be held is available on the DPH RTCR [webpage](#).

Please contact the Drinking Water Section at 860-509-7333 with questions or concerns regarding the revisions and the new requirements of the Revised Total Coliform Rule.

cc: Ellen Blaschinski, Branch Chief – Regulatory Services Branch, Local Health Directors, EDI Lab Directors