




Florida Department of Environmental Protection
Water Compliance Assurance Program

RTCR Assessments


FL/AL Joint Rural Water Conference - 2018

RTCR Assessments

- **Level 1 Assessment:** An evaluation to identify the possible presence of “sanitary defects”, deficiencies in monitoring practices, and if possible, the likely reason that the assessment was triggered. It is often performed by a single individual.
- **Level 2 Assessment:** A much more detailed evaluation to find “sanitary defects” when there is a higher indicator of microbiological contamination. It may include additional sampling and consultation with 3rd parties.


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RTCR Assessments

- Assessments must include the following elements which might affect water quality:
 - Atypical events anywhere between production and use
 - Maintenance or operational changes in distribution or storage
 - Source and treatment considerations
 - Existing water quality monitoring data
 - Inadequacies in sample sites, sampling protocol, or sample processing
 - Corrective actions and a proposed timetable for incomplete ones

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What's the Difference?

Level 1 Assessment

I. Evaluate sample site.
 -condition or location of tap
 -regular use of connection
 -weather conditions

Level 2 Assessment

I. Evaluate sample site.
a. What is the condition of the tap? (Provide comments)
b. What is the location of the tap? (Provide comments)
c. What is the regular use of the connection? (Provide comments)
d. Were there any operation and maintenance activities that could have introduced total coliforms?
e. Have there been any plumbing breaks or failure? If yes, when?
f. List any identified cross connections after the service connection or in premise plumbing. (Provide comments)
g. Were all the backflow prevention devices present, operational, and maintained?
h. Were there any low pressure events or changes in the water pressure after the service connection or in the premise plumbing? If yes, when?
i. Are there any treatment devices after the service connection or in premise? (Circle response, if applicable)
j. Other comments on sample site?

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Level 1 Assessment Triggers

- Required after failing to take all repeat samples following a Total Coliform-positive (TC+) bacteria sample result
- Hitting the sampling period threshold of TC+ distribution samples.
 - The thresholds are hits on 2 samples for systems taking <40 dist. samples, or >5% of samples for systems taking 40+
 - Repeat samples count toward this

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Who can Perform a Level 1?

- A representative of the water system in question.
 - No licensure is required.

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Level 2 Assessment Triggers

- Triggered by an *E. coli* MCL violation:
 - TC+ compliance sample result followed by an E. coli+ repeat*
 - E. coli+ compliance sample result followed by an E. coli+ or TC+ repeat*
 - Failure to collect all repeat samples following an E. coli+ compliance sample*
- An escalation of the second Lvl. 1 assessment in a rolling 12-month period, (or in consecutive years for annually tested systems)
- For Florida, as part of a bacteriological sampling frequency reduction request

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Who can Perform a Level 2?

- A Licensed Operator who would be qualified to run the system in question, Rural Water Association Circuit Rider, or a Florida-Licensed Professional Engineer.
- Must be a different individual than who performed an associated Lvl. 1 Assessment, if any
- Can work for the water system in question

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Assessment Timeframes

- A water system has 30 days after learning of an assessment trigger to perform the assessment AND complete corrections.
 - Exceptions or extensions to the 30 day timeframe are possible, but require State approval.

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Assessment Repercussions

- Assessments or associated corrective actions not done correctly, timely, or at all, are Treatment Technique Violations.
- For Florida a triggered Level 2 Assessment, two Level 1 Assessments in a rolling 12 month period, or a Level 1 Assessment and a RTCR Monitoring Violation, will result in increased monitoring.
- Must be noted in community water system's CCR.

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CCR Requirements

- Assessments are required to be included in CCRs.
 - Information about number of assessments required
 - Information about corrective actions taken
 - Information about uncompleted assessments or corrections

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Want to Know More?

For details on Level 1 & 2 Assessments, please see the EPA's Revised Total Coliform Rule Assessments and Corrective Actions Guidance Manual.

Sources & Credits:

Fla. Admin. Code, 62-550.830

LDHH EPA RTCR Training Presentation

Fla. DOH FACTSHEET: Revised Total Coliform Rule (RTCR)

Revised Total Coliform Rule Assessments and Corrective Actions Guidance Manual, U.S. EPA

Tom DeLoach, ADEM

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