

Drinking Water Advisory Work Group



Lessons Learned from Level 2
Assessments (L2As) under the
Revised Total Coliform Rule
(RTCR)

Austin, Texas

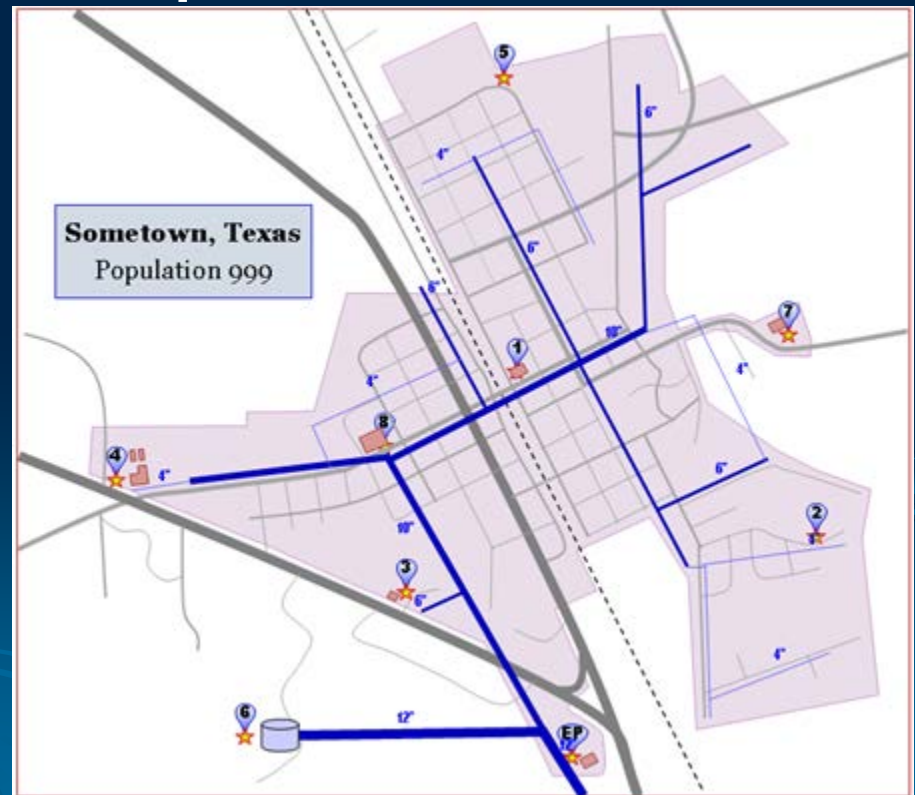
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Gaps in Understanding



- Revised Total Coliform Rule (RTCR) requirements are complex
 - PWSs that trigger L2As often need help understanding the RTCR
 - Coliform Sample Siting Plans (SSPs)
 - Also NAPs and Monitoring Plan



Disinfectant Residual Sampling Errors



Use the correct sample cells, instrument settings, reagents and sample volumes during analysis



Positive Samples



Examples of Sanitary Defects



- Sampler Error
- Other

- “Other” examples
 - Poor coliform sample sites
 - Failed chlorinator on TC+ well
 - Improper sanitary precautions
- “Sampler error” is uncommon!

L2A Assessor Training



- Interim training process for L2A assessors
 - TCEQ provides on-site training to a PWS's appointed L2A assessor
 - Essentially a 1-day, crash course in how to conduct an L2A
 - Review all questions in the L2A Form
 - As time allows, visit PWS's coliform sample sites and facilities

L2A Assessor Training



- Interim training process results
 - PWS L2A submittals – demonstrate that inexperienced L2A assessors cannot be adequately trained in one day
 - TCEQ's onsite assistance – allows the L2A submittals to be revised by TCEQ
- Important implications for future requirements for L2A assessors (still under development)

Corrective Action Report and Plan (CARP)



- A CARP will be sent to systems after the review of their L2A form
- The list of CARP items will only include sanitary defects
- Deadlines for required actions will be included
- Recommendations and requirements for best practices will also be included

Increase in L2As



- The number of L2As triggered increased noticeably from 2017 to 2018.
- Events requiring staff or approved contractor participation increased from 23 to 42.

PWS Facilities



- TCEQ's Inventory of Facilities
 - Initial inventory and updates are often not reported correctly to TCEQ
 - Discrepancies between what needs to be assessed and what is in existing sampling plans.
 - L2As provide opportunities to clean up Inventory

Who Can Currently Perform an L2A



- TCEQ Texas Optimization Program staff
- Approved contractors (not many)
- TCEQ trained PWS staff (if a 2nd L2A is triggered, TCEQ staff, or an approved contractor, will become the assessor)