Guidance Manuals to Accompany Proposed Revised TCR

Prioritization, scope, and schedule

Proposed revised Total Coliform Rule (RTCR)
Stakeholder Meeting
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Objectives

- Introduce potential guidance document topics to accompany RTCR
- Discuss need, scope, and priority of guidance document topics
- Outline schedule

What guidance has EPA provided with recent rules?

- Quick reference guides / pocket guides
  - Rule overview
    - e.g., separate guide for each system size category
  - Specific rule provision
    - e.g., for provisions implemented in the field (e.g., sample collection)
- Fact sheets
  - General rule requirements
  - Specific rule provisions
- Guidance documents
  - Specific rule provisions
  - Consecutive systems
  - Small entity compliance
  - Particular treatment technique or toolbox of treatment techniques
  - Simultaneous compliance
  - Implementation guidance (for States)

Guidance for the current TCR

- A Small Systems Guide to the Total Coliform Rule
  - Provides information for community water systems serving <3,300
  - Explains requirements and includes worksheets to help track
- TCR: A Handbook for Small Noncommunity Water Systems serving less than 3,300 persons
  - Provides information for noncommunity water systems serving <3,300
  - Explains requirements and includes worksheets to help track
- Interactive Sampling Guide for Operators (CD-ROM)
  - Provides help with understanding procedures of collecting SDWA samples including TCR samples
- Revised Public Notification Handbook
  - Includes templates for public notification
- Small Systems Compliance Technology List for the Surface Water Treatment Rule and TCR
  - Examples include protection of wells/wellhead, DS maintenance, filtration and/or disinfection, and maintenance of residual in DS

http://www.epa.gov/safewater/disinfection/tcr/compliancehelp.html

Examples of new or revised guidance for RTCR

- Assessments and Corrective Action
- Monitoring/Sampling Plan
- Possible revisions to existing guidance, as appropriate (e.g., small entity guidance, GWR guidance)
- Broken out by size and type of system

Assessments and Corrective Action: Potential Scope of Guidance

- Recap requirements and provide purpose and example for how to conduct:
  - Level 1 & Level 2 Assessments
  - Example Assessment forms
  - Example sanitary defects and their correction (corrective action)
  - Annual Site Visit (to qualify for annual monitoring)
- Provide guidance for systems based on:
  - Size
  - Source water (GW, SW, consecutive systems)
  - Treatment
  - Attributes of distribution system

Monitoring/Sampling: Potential Scope of Guidance

- Monitoring Schedule
  - Recap requirements and provide guidance on:
    - How to qualify for reduced monitoring
    - What will trigger systems back to baseline or up to increased monitoring
- Sample Collection
  - Where, when, and how samples should be taken
  - Sample siting plans – provide guidance and/or a list of existing resources
  - What to consider when taking repeat samples beyond 5 upstream or downstream taps

Proposed Plan

- Begin development of highest priority guidance and solicit comment in 2010
  - Update existing TCR guidance depending on final rule, as appropriate
- Depending on the number of guidance, complete final documents or solicit comment on draft documents following final rule
  - Order of completion time depends on priority

Discussion Questions

- What is the priority of guidance documents?
  - Assessment and corrective action
  - Monitoring sample plan
  - Revision of existing guidance
- Additional guidance documents that would be helpful to utilities and states?