

Massachusetts Department of Environmental Protection

Bureau of Water Resources - Drinking Water Program

Criteria for Approval of Individuals Allowed to Conduct RTCR Level 2 Assessments

Level 2 assessments required per the Revised Total Coliform Rule (RTCR) may be conducted by MassDEP or a party approved by MassDEP. This document is intended to provide the criteria and process for MassDEP approval of individuals allowed to conduct Level 2 assessments.

Pursuant to 310 CMR 22.05(12)(a)6, a Supplier of Water is required to notify MassDEP as soon as possible but no later than five days after the collection date of the sample that, in accordance with 310 CMR 22.05(4)(a)1. or 2., triggered an assessment.* The Supplier of Water is also responsible for ensuring that Level 2 assessments are conducted by MassDEP-approved parties. MassDEP Drinking Water Program (DWP) staff will determine approval of the party designated to conduct the Level 2 assessment after notification by the Supplier of Water that the assessment has been triggered.

The MassDEP determination of approval may be either verbal or written; however, in all cases where MassDEP elects to perform the Level 2 assessment, notification to the Supplier of Water will be in writing.**

MassDEP-approved individuals will be referred to as Lead Assessor. The following individuals shall be considered by MassDEP to have the minimum qualifications to conduct Level 2 assessments as Lead Assessor.

Certified Drinking Water Supply Facility Operators who maintain a full license of grade level at least equal to the classification of the distribution system and/or treatment system, if applicable

Technical Assistance Providers under contract with the state

MassDEP recognizes that there are a wide range of individuals who possess the qualifications to perform Level 2 Assessments. Individuals with the following qualifications may be considered by MassDEP to perform Level 2 Assessments with prior approval.

- Experience with Public Water Systems,
- An understanding of the objectives and structure of RTCR,
- An understanding of the nature of the coliform group and E. coli, including its sources, control
 and public health significance,
- A familiarity with bacteriological sampling practices,
- A working knowledge in how to interpret distribution system operational and water quality data,
- A working knowledge in how to interpret source data,
- An understanding of disinfection practices and the potential implications of changes in disinfection practices,
- Familiarity with similar water system treatment plants and distribution systems,
- Ability of assessor to coordinate with other experts on the technologies/facilities present in the PWS as necessary (i.e. cross connection surveyors and testers, well drillers, treatment operators),
- Certification such as Drinking Water Supply Facilities Operator-In-Training, Licensed Professional Engineers, or Registered Sanitarians,

*310 CMR 22.05(4): Coliform Treatment Technique Triggers and Assessment Requirements

310 CMR 22.05(4)(a)2. Level 2 Treatment Technique triggers. Any of the following occurrences is a Level 2 Treatment Technique trigger:

- a. An E.coli MCL violation, as specified in 310 CMR 22.05(11); or
- b. A second occurrence of a Level 1 trigger, as defined in 310 CMR 22.05(4)(a)1., within a rolling 12-month period, unless the Department has determined a likely reason that the samples that caused the first Level 1 Treatment Technique trigger were total coliform-positive and has established that the Supplier of Water has corrected the problem.

** 310 CMR 22.05(4)(b)1.b. Level 2 Assessments

A Supplier of Water shall ensure that Level 2 Assessments are conducted by Department-approved parties, ...unless notified in writing, within ten days of the Supplier of Water's Treatment Technique trigger notification to the Department pursuant to 310 CMR 22.05(4)(a) that the Level 2 Assessment will be conducted by the Department.

310 CMR 22.05(8)(a) - E.coli MCL Violations

E. coli positive repeat sample following an associated total coliform positive routine sample

Total coliform positive repeat sample following an E. coli positive routine sample

Supplier of Water fails to take all required repeat samples following an E.coli positive routine sample

Supplier of Water fails to test for E.coli when any repeat sample tests positive for total coliform

For more information regarding who may be approved to conduct Level 2 assessments under RTCR, please contact the MassDEP Drinking Water Program Boston office, or your MassDEP regional office.

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