RTCR Failure of a Seasonal System to

Complete Start-Up Procedures – Template 2-1

**Instructions:**  (Template follows instructions pages)

**Description of Violation or Situation**

Beginning April 1, 2016, a seasonal non-community water system (NCWS) that fails to follow state-approved start-up procedures prior to serving water to the public after the system had been out of service has incurred a treatment technique (TT) violation. This violation requires Tier 2 public notification. Start-up procedures are approved by the state and may include, but are not limited to, activities such as:

* Inspecting all water system components, including source(s), treatment components, distribution lines, and storage tanks and addressing any issues.
* Activating the source and thoroughly flushing water through all pipes in the water system.
* Draining and re-filling storage tanks.
* Chlorinating the water in the system and leaving the chlorinated water in the system for at least 24 hours before flushing the water to waste.
* Collecting water samples at key locations within the system and ensuring the water system is not contaminated by bacteria.

You must provide public notice to persons served as soon as practical but no later than 30 days after you learn of the violation (310 CMR 22.16 (3)(b)). You may be required to provide an alternate source of water for this monitoring violation. Check with your regional MassDEP office to make sure you meet all requirements.

NCWSs must use one of the following methods to deliver the notice to consumers (310 CMR 22.16 (3)(c)).

• Posting in conspicuous locations

• Hand delivery

• Mail

• Another method approved in writing by MassDEP

In addition, systems must use another method reasonably calculated to reach others if they would not be reached by the first method (310 CMR 22.16 (3)(c)). Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, it is recommended that you print on your system’s letterhead, if available.

The notice at the end of these instructions is appropriate for mailing, posting, or hand delivery. If you modify this notice, you must still include all required public notice elements from (310 CMR 22.16 (5)) and leave the mandatory language unchanged. All posted notices must remain in place for as long as the violation or situation persists but in no case for less than seven days, even if the violation or situation is resolved.

**Mandatory Language**

Mandatory language on health effects (31 CMR 22.16 (5)(d) must be included as written if the required start-up procedure includes collecting coliform bacteria samples. The mandatory language is provided below and is presented in this notice in *italics*. You will need to update the information presented in brackets with the appropriate information. If monitoring is not required as part of the start-up procedures the italicized mandatory language should be omitted, and language must be used to appropriately describe the violation.

*We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During [compliance period], we “did not complete all monitoring or testing “ for [contaminant(s)] and therefore cannot be sure of the quality of your drinking water during that time.*

You must also include standard language to encourage the distribution of the public notice to all persons served, were applicable (310 CMR 22.15 (5)(d)). This language is also presented in this notice in italics.

**Corrective Action**

In your notice, you must describe corrective actions you are taking and when you expect to return to compliance or resolve the situation (310 CMR 22.16(5)(a)). Do not use overly technical terminology when describing treatment methods. Listed below are some steps commonly taken by water systems with TT violations relating to incomplete star-up procedures. Depending on the corrective action you are taking, you can use the following statement, if appropriate, or develop your own text:

* We have completed the required start-up procedures and provided the appropriate certification to the state. The procedures included [describe what you did, for example, flushed the system, disinfected the system, collected total coliform bacteria samples, etc.]
* We have collected [number] coliform bacteria samples as required and [number] sample results were negative for total coliform bacteria.

**Repeat Notices**

For repeat notices, you should state how long the violation has been ongoing and remind consumers of when you sent out any previous notices (310 CMR 22.16(3((b)).

**After Issuing the Notice**

Make sure to send your MassDEP regional office and local board of health a copy of each type of notice and a certification that you have met all public notification requirements within 10 days after issuing the notice (310 CMR 22.16 (3)(b))

**Important Information about Your Drinking Water**

**[System] Failed to Complete**

**Seasonal Start-Up Procedures**

Before we open each year and serve water to the public, we are required to complete certain start-up procedures to make sure the water we provide is safe to drink. This year we failed to [describe what you failed to do, for example, disinfect the water system or collect the required number of coliform bacteria samples] before providing water. As our customers, you have a right to know what happened and what we are doing to correct this situation.

Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and associated headaches.

*We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During [compliance period], we “did not complete all monitoring or testing” for [contaminant(s)], and therefore cannot be sure of the quality of your drinking water during that time.*

**What should I do?**

If you have specific health concerns, have a severely compromised immune system, are pregnant or have an infant, or are elderly, you may be at increased risk and should seek advice from your healthcare provider about drinking the water. General guidelines on ways to lessen the risk of infection by bacteria and other disease-causing organisms are available by emailing the EPA at [safewater@epa.gov](mailto:safewater@epa.gov).

**What does this mean?**

This is not an emergency, as we have completed the start-up procedures. If it had been, you would have been notified within 24 hours.

Failure to perform the required start-up procedures prior to serving water to the public has the potential to distribute contaminated water. When our system shuts down operation, the lack of pressure in our pipes can allow the entry of bacteria and other disease-causing microorganisms into the drinking water. By performing start-up procedures such as flushing the pipes, disinfecting the water, and collecting a coliform bacteria sample before we open, we can be sure that we are providing you with safe water.

**What is being Done?**

[Describe corrective action, seasonal fluctuations, and when system expects to return to compliance.]

**Where can I get additional information?**

If you have questions about your water system’s operation, water quality monitoring, or response to this issue, please contact the system operator directly. If you have questions about the drinking water regulations or health risks posed by pathogens in drinking water, you can contact the MassDEP Drinking Water Program at: [program.director-dwp@mass.gov](https://d.docs.live.net/799140f645adb103/Drinking%20Water/Users/Mike/Downloads/program.director-dwp@mass.gov) or 617-292-5770. If you have questions about specific symptoms, you can contact your doctor or other health care provider. If you have general questions about public health, you can contact the Massachusetts Department of Public Health at 617-624-5757.

For more information, please contact [name of contact] at [phone number] [email] or [mailing address].

*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, an businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.*

This notice is being sent to you by [system]. PWS ID#: [xxxxxxx] Date distributed:[mm/dd/yyyy]