



Center for Drinking Water Quality
Seasonal Public Water Systems

Seasonal Start-up Kit

A lot can happen in the off-season; the process of starting up and shutting down a seasonal public water system (PWS) presents opportunities for contamination to enter or spread through the distribution system. Use this *Seasonal Start-up Kit* as a guide for planning your start-up timeline and preparing your system for the season. This kit includes a review of start-up requirements, important reminders, a Start-up Checklist, and Frequently Asked Questions.

You Are Required to Do the Following Before the Seasonal PWS Opening Date:

- **Follow the procedures** in your RIDOH-approved *Seasonal Start-Up Plan*.
- **Complete the *Seasonal Start-Up Form***. It confirms that the approved *Seasonal Start-up Plan* was followed and the system has been tested for coliform bacteria.
- **Include documentation of system's absent test sample**. This proves that coliform bacteria are not present in the system you plan to open. You can contact your lab for official documentation (either laboratory report or data upload).
- **Send the *Seasonal Start-Up Form* and documentation of absent sample results to RIDOH before you open or serve the public (including staff and workers).**

Email forms to DOH.RIDWQ@health.ri.gov, fax forms to 401-222-6953, or mail forms to Rhode Island Department of Health – Center for Drinking Water Quality, 3 Capitol Hill, Room 209, Providence, RI 02908

If these steps are not completed prior to your opening date, you risk receiving a violation.

Notify RIDOH in Writing if Start-Up Date Is Changing from Last Year

You must notify RIDOH in writing (email is acceptable) if your seasonal start-up date has changed from last year. Unless notified otherwise, RIDOH will assume your opening date will occur on the same day as the previous year. This notification must occur before the assumed 2024 opening date and before serving water to the public, including staff and workers. For example, if you previously opened on May 15 and your planned 2024 opening date is different, you must notify RIDOH of the new date before May 15 and before the 2024 opening date.

Important Reminders About Sampling and Monitoring:

- In addition to start-up sampling, remember to take annual well samples and follow your monitoring schedule. Monitoring schedules are available on Drinking Water Watch (health.ri.gov/waterinfo).
 - Remember to take all required annual well samples (such as for nitrate, nitrite, and coliform as applicable) while the PWS is open, i.e. between the opening and closing dates on the *Seasonal Start-Up Form*.



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- Pay close attention to whether you are on a quarterly or monthly routine coliform schedule.

For Public Water Systems on Quarterly Monitoring:

- You must sample in the first month of each quarter (the “peak use” period).
- If you don’t open your system in the first month of the quarter, you must sample in the first month you are open. For all subsequent quarters, sample in the first month of the quarter.
- If your system is open even for one day during the quarter, you must collect a sample for that quarter.

For Public Water Systems on Monthly Monitoring:

- You must sample in the first month you are open; remember to take normal monthly samples starting the next month and for the rest of the season.
 - If your system is open even for one day during the month, you must collect a sample for that month.
- Your “closing date” is the date your PWS, or the seasonal part of the PWS, will be de-watering. If the pipes are still pressurized, then the PWS is still considered open and you must provide a sample for the month or quarter. For example, if your closing date October 1, you must sample on October 1 for October or the fourth quarter.
 - For general information about required monitoring for coliform bacteria, visit health.ri.gov/water/about/revisedtotalcoliformrule/.





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Start-up Checklist

Communicate with Rhode Island Department of Health (RIDOH) each year

- Inform RIDOH immediately if your opening dates or *Seasonal Start-up Plan* change

Organize your resources

- Your customized *Seasonal Start-up Plan* (required to keep on-site)
- Sampling plan (required to keep on-site)
- Seasonal Start-up Frequently Asked Questions
- RIDOH's *Well Disinfection Procedure*
- Emergency contact list
- Use the schedule on Drinking Water Watch (health.ri.gov/waterinfo) and the open period from the *Seasonal Start-up Form* to plan quarterly/monthly routine monitoring and annual well sampling

Inspect your entire system (all steps may not be applicable)

- Well is secure and in good condition (no openings besides the screened vent)
- Storage tanks are in good condition (no leaks, rust, or sediment) with screens on the vent, drain, and/or overflow
- Backflow prevention devices are working properly with no leaks
- Testable backflow prevention devices are tested every year by a certified inspector
- Pressure tanks maintain pressure and tank/components are in working condition
- Treatment components are working correctly
- Distribution lines (pipes) have no leaks and are not exposed
- Sample faucets are non-swivel, clean, and leak-free

Disinfect and flush system

- System is chlorinated by following RIDOH's well disinfection procedure
- System is properly flushed to achieve 0.0mg/L chlorine residual in the distribution system

Start-up sampling

- Take start-up coliform sample and obtain laboratory report or complete data upload.



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Start-up Checklist

Complete and submit required form to RIDOH

- Complete the *Seasonal Start-up Form*
- Return the *Seasonal Start-up Form* and send the laboratory report or complete data upload confirming coliform-absent sample results to RIDOH before opening the system.

Stay in touch throughout the season

- Enjoy your season! If you have questions, you can contact RIDOH at any time.
- If the closing date changes from the one you submit on the *Seasonal Start-up Form*, update RIDOH in writing. Remember, RIDOH uses the closing date to determine your system's monitoring schedules.





Frequently Asked Questions

What is the difference between a seasonal PWS and a partially seasonal PWS?

Seasonal systems are non-community systems that are not operated as public water systems year-round. Seasonal water systems completely shut down for part of the year. Partially seasonal systems maintain year-round water service in a part of a system, but completely shut down the rest of the distribution system for part of the year.

What form does the system submit to RIDOH to ensure compliance?

Seasonal and partially seasonal water systems must complete and send the *Seasonal Start-up Form* with documentation of water sample results after completing start-up procedures but before your opening date. This form confirms that the system's approved *Seasonal Start-up Plan* was followed, and the system has been tested for coliform bacteria.

What if the system wants to change its opening or closing dates?

- Every year you must notify RIDOH of the opening and closing dates for the upcoming season using the *Seasonal Start-up Form*. Keep a copy of the *Form* on file for your reference.
- If the opening date changes from the *Seasonal Start-up Form*, you must notify RIDOH in writing before serving water to the public (including staff and workers) and before the day of your previous opening.
- If the system's new opening date is before or after last year's and you do not inform RIDOH, the system may receive a treatment technique violation. RIDOH assumes the system is open on the date you provided unless notified otherwise.
- If a date(s) changes after the system's administrator sends the *Seasonal Start-up Form*, contact our office at 401-222-6867 or DOH.RIDWQ@health.ri.gov as soon as possible.
- If the system's new closing date is in the month before the original one and you do not inform RIDOH, the system may receive a monitoring violation. For example, if a system provides a closing date of October 1, but closes September 30 without informing RIDOH, the system will receive a monitoring violation for October.
- If the system is open at any point during a month or quarter, you must sample for that month or quarter.

What does the system need to do if its first sample has coliform bacteria present?

If the first sample is positive for coliform bacteria, you will need to take a repeat sample. Before taking a repeat sample, conduct a system assessment to identify and fix any issues. Follow the proper disinfection procedure afterward. The system may not serve the public until it has a coliform-absent sample. RIDOH recommends performing your *Seasonal Start-up Plan* procedure one to two weeks prior to your opening date.



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Frequently Asked Questions

Do partially seasonal systems collect start-up samples for each part of the system?

Yes, you will need to provide a start-up sample for each part of the system as it is started up. Partially seasonal systems must be sure to sample the seasonal side of their systems (not the year-round side) when starting up.

What is peak use and what does it mean for sampling?

- Peak use is the period during which a water system is most vulnerable to contamination.
- Peak use only applies if the system is on a quarterly sampling schedule.
- You must sample the system in the first month of each quarter.
- If the system is not open in the first month of a quarter, you must sample in the first month it is open.

How does the system properly disinfect and flush its system?

Refer to RIDOH's *Well Disinfection Procedure* for detailed instructions.

How does RIDOH define closed?

A system is closed when it is de-watered. A system is still open if staff and workers can access the water. The system must be de-watered before the end of the sampling period (monthly or quarterly) or another sample will be required. For example, if a system that samples quarterly is not drained by September 30, it is still considered open for the fourth quarter, and it must collect a water sample before shutting down for the season. If a system that samples monthly is not de-watered before November 1, then it must collect a sample for the month of November.

If the system needs to change its *Seasonal Start-up Plan*, what do I do?

Contact our office at 401-222-6867 or DOH.RIDWQ@health.ri.gov for review and approval of any changes.