

Distribution System Evaluation Checklist

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System Name: _____
Checklist Completed by: _____ Date: _____

A. Do you have disinfectant residual or temperature data for the monitoring location where you experienced the OEL exceedance? Yes No

If NO, proceed to item B. If YES, answer the following questions for the period in which an OEL exceedance occurred:

Yes No

Was the water temperature higher than normal for that time of the year at that location?

Was the disinfectant residual lower than normal for that time of the year at that location?

Was the disinfectant residual higher than normal for that time of the year at that location?

B. Do you have maintenance records available for the time period just prior to the OEL exceedance? Yes No

If NO, proceed to item C. If YES, answer the following questions:

Yes No

Did any line breaks or replacements occur in the vicinity of the exceedance?

Were any storage tanks or reservoirs taken off-line and cleaned?

Did flushing or other hydraulic disturbances (e.g., fires) occur in the vicinity of the exceedance?

Were any valves operated in the vicinity of the OEL exceedances?

C. If your system is metered, do you have access to historical records showing water use at individual service connections? Yes No

If NO, proceed to item D. If YES, was overall water use in your system unusually low, indicating higher than normal water age? Yes No

D. Do you have high-volume customers in your system (e.g., an industrial processing plant)? Yes No

If NO, proceed to item E. If YES, was there a change in water use by a high-volume customer? Yes No

E. Is there a finished water storage facility hydraulically upstream from the monitoring location where you experienced the OEL exceedance? Yes No

If NO, proceed to item F. If YES, review storage facility operations and water quality data to answer the following questions for the period in which the OEL exceedance occurred:

Yes No

Was a disinfectant residual detected in the stored water or at the tank outlet?

Do you know of any mixing problems with the tank or reservoir?

Does the facility operate in "last in-first out" mode?

Was the tank or reservoir drawn down more than usual prior to OEL exceedance, indicating a possible discharge of stagnant water?

Was there a change in water level fluctuations that would have resulted in increased water age within the tank or reservoir?

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F. Does your system practice booster chlorination? Yes No
If NO, proceed to item G. If YES, was there an increase in booster chlorination feed rates? Yes No

G. Did you have customer complaints in the vicinity of the OEL exceedance? Yes No
If NO, proceed to item H. If YES, explain.

H. Did concern about complying with a rule other than Stage 2 DBPR, such as the Lead and Copper rule, the TCR, or any other rule constrain your options to reduce the DBP levels at this site? For example, are you limited by the need to maintain a detectable disinfectant residual in your ability to control DBP levels in the distribution system? Yes No
If NO, proceed to item I. If YES, explain below and consult EPA's *Simultaneous Compliance Guidance Manual* for alternative compliance approaches.

I. **Conclusion**

Did the distribution system cause or contribute to the OEL exceedance(s)? Yes No
 Possibly

If NO, proceed to evaluations of treatment systems and source water. If YES or POSSIBLY, explain below.
