



The Revised Total Coliform Rule: Key Changes for Laboratories

Important changes to total coliform bacteria monitoring take effect on April 1, 2016

What is the Revised Total Coliform Rule (RTCR)?

U.S. EPA issued a rule that changes the total coliform bacteria (TC) monitoring requirements and the way public water systems must respond when samples are TC positive (TC+). Ohio EPA is required to adopt the new requirements, which take effect on April 1, 2016. Additional information is available at: <http://epa.ohio.gov/ddagw/rtrcr.aspx>

Who will be affected by the changes?

All public water systems will be affected.

Sample Siting Plan

- All public water systems must have a revised Sample Siting Plan by April 1, 2016. Copies of the new Sample Siting Plan Templates are available online at: <http://epa.ohio.gov/ddagw/rtrcr.aspx>
- The physical locations of routine and repeat samples noted in the Sample Siting Plan must match the locations listed on the Sample Submission Report (SSR).
- **NOTE:** PWSs that do not conduct their monitoring in accordance with their written Sample Siting Plan can incur a monitoring violation.

Routine Sample Requirements

- Most public water systems will transition to the RTCR under their current routine monitoring schedule.
- Only noncommunity ground water systems serving $\leq 1,000$ people may see changes to their routine quarterly monitoring schedules if:
 - The system meets the criteria for increased monitoring.
 - Seasonal systems that depressurize any part of their system may begin monthly monitoring upon completion of a detailed monitoring evaluation conducted by Ohio EPA.
- Routine samples must be collected from the location(s) noted on the system's Sample Siting Plan.

Repeat Sample Requirements

- The number of repeat samples is now 3 (instead of 4).
- Systems must collect 3 repeat samples for **each** routine TC+ (e.g., 3 routine TC+ = 9 repeat samples).
- Repeat samples must be collected within 24 hours of water system notification, unless an extension is justified by the water system due to specific circumstances (e.g., no sample bottles available, extreme weather, lab not available due to holiday, weekend or a power outage). The reason for the extension must be noted in the comments section of the SSR.
- All 3 repeat samples must be collected on the same day from the location(s) noted on the system's Sample Siting Plan.

Laboratory Recommendations

- 1) Provide systems with extra sample bottles to allow them to collect repeat samples within the 24-hr deadline.
- 2) Collect routine samples early in the week in case repeat sampling is necessary.

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Temporary Routine Sample Requirements

Systems on quarterly monitoring are required to collect 3 routine samples the month following a TC+ result (reduced from 5 to 3). The samples must be collected from the location(s) noted on the system's Sample Siting Plan.

- If the samples are collected from different taps, they may be collected on the same day.
- If the samples are collected from the same tap, they shall be collected at regular time intervals throughout the month.

Systems on monthly monitoring resume collecting routine samples according to their monitoring schedule the month following a TC+ result.

Sample Submission Reports

- The location of the sample is critical under the RTCR. The sample location on the SSR must match the sample location listed in the system's Sample Siting Plan. Wrong location = Monitoring violation.
- Whatever is written in the comments section of the SSR must be transferred into the electronic SSR through eDWR. The comments box in the SSR shall include:
 - "Start-Up" (if it is a start-up special purpose sample for a seasonal public water system)
 - "GWR001" (if required to submit a raw source water sample for a ground water system)
 - "Confirmatory GWR001" (if confirmatory samples are required following an EC+ from a raw source)
 - Reason for an extension of the 24 hour repeat sample collection requirement (if any)

Seasonal System Start-Up Requirements

Depressurized and partially-depressurized seasonal systems opening on or after April 1, 2016, are required to complete an annual Start-Up Checklist and submit a Start-Up Certification Form.

As part of the Start-Up Checklist, the system is required to collect at least one (1) special purpose TC sample. The phrase "**Start-Up**" must be included in the comments section of the special purpose sample's SSR. The Start-Up Certification Form cannot be submitted (and the system cannot serve water to the public) until a TC-negative sample result is received. Therefore, the lab should submit start-up sample results to water systems and Ohio EPA as soon as possible.

- If the sample is TC-negative, the system can complete and submit the Start-Up Certification Form and begin serving water to the public.
- If the sample is TC+, the system shall repeat the disinfection and flushing procedure and collect 2 special purpose samples at least 24 hours apart. The system cannot serve water to the public until both special purpose samples are TC-negative.

Start-Up Special Purpose Samples

- 1) Delay in results = Delay in serving water
- 2) Write "**Start-Up**" in comments section of Sample Submission Report

Fully-pressurized year-round seasonal systems may be required to complete the Simplified Start-Up Checklist.

Violations and Treatment Technique Triggers

- No more maximum contaminant level (MCL) for total coliform (replaced by a Level 1 or Level 2 Assessment).
- MCL for E. coli will trigger a more intensive, Level 2 Assessment.
- TC+ samples may trigger a Level 1 or Level 2 Assessment to find and fix the cause.

This fact sheet is intended to describe some key requirements under the Revised Total Coliform Rule. It is not a complete summary of the requirements for public water systems.

Contact

For more information, visit: <http://epa.ohio.gov/ddagw/rtrcr.aspx> or contact a local District Office:

Northwest: 419-352-8461 **Northeast:** 330-963-1200
Southwest: 937-285-6357 **Central:** 614-728-3778 **Southeast:** 740-385-8501