

## The Revised Total Coliform Rule: Seasonal Public Water Systems

### *Important changes to total coliform bacteria monitoring took effect on April 1, 2016*

*This fact sheet intends to explain key requirements under the Revised Total Coliform Rule for small, seasonal public water systems that use ground water and serve water to 1,000 people or less. It is not a complete summary of the requirements.*

### What is the Revised Total Coliform Rule (RTCR)?

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

### Three types of Seasonal PWSs:

1. **Depressurized:** The entire water system is depressurized (all of the waterlines are drained) for a period of time each year.
2. **Partially-Depressurized:** The water system is partially-depressurized (some of the waterlines are drained) for a period of time each year.
3. **Fully-Pressurized Year-Round:** The entire water system stays fully-pressurized (none of the waterlines are drained), but no one has access to the water for a period of time during the year (must be more than 90 consecutive days).

### Start-Up Checklist and Certification Form

Beginning April 1, 2016, all depressurized and partially-depressurized seasonal PWSs are required to complete a Start-Up Checklist and Start-Up Certification Form every year before the system can serve water to the public. The PWS should keep the Start-Up Checklist in its records for Ohio EPA review. The PWS is required to submit the Start-Up Certification form **prior to serving water to the public**. The Start-Up Certification Form cannot be submitted until the system receives TC-negative start-up sample results. Therefore, the system should **request results from the lab as soon as they are available**.

- The Start-Up Checklist includes submission of at least one "Start-Up" special purpose TC sample. For this sample, write "**Start-Up**" in the comments section of the Sample Submission Report provided to the lab.
- **If the "Start-Up" sample is TC-negative**, the PWS can complete and submit the "Annual Start-Up Certification" form.
- **If the "Start-Up" sample is TC+**, the PWS must repeat the disinfection and flushing procedure and collect at least 2 "Start-Up" special purpose TC samples at least 24 hours apart. Both samples must be TC-negative before the system can submit the "Annual Start-Up Certification" form and serve water to the public.
- Seasonal systems that are fully-pressurized year-round will be notified if they are required to complete the Simplified Start-Up Checklist.

### Key Changes

- 1) Depressurized and partially-depressurized seasonal PWSs are required to complete a Start-Up Checklist and submit a Start-Up Certification form every year.
- 2) All systems must update their Sample Siting Plan. Templates are available at <http://epa.ohio.gov/ddagw/rtrcr.aspx>
- 3) Routine TC monitoring summary:
  - a. Depressurized:  
Once/month during operating season
  - b. Partially-Depressurized:  
Once/month during operating season  
Once/quarter during off-season
  - c. Fully-Pressurized Year-Round:  
Once/quarter year-round
- 4) Within 24 hours of being notified, systems are required to collect 3 repeat samples for each TC+ routine sample, unless an extension is justified.
- 5) Number of temporary routine samples in the month following a TC+ routine sample:
  - a. If on quarterly schedule: Three (3)
  - b. If on monthly schedule: One (1)
- 6) TC+ samples may trigger an assessment to find and fix the cause.

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## Assessments

The RTCR requires a “Find & Fix” approach when bacteria are present in the water system. If a trigger occurs, a Level 1 or Level 2 Assessment must be performed.

### What is a Level 1 Assessment?

Basic examination of the entire water system to try to identify the cause of the TC+ samples. Ohio EPA will contact the PWS by telephone to conduct the assessment.

#### What triggers a Level 1 Assessment?

- 1) 2 or more TC samples collected during any month are TC+;
- 2) When the required repeats samples are not collected, or are not collected in a timely manner, after a routine samples is TC+ (E. coli-negative).

### What is a Level 2 Assessment?

A more in-depth examination of the entire water system. Ohio EPA inspector will perform this evaluation on site with the PWS.

#### What triggers a Level 2 Assessment?

- 1) E. coli maximum contaminant level violation;
- 2) A second Level 1 Assessment is triggered within a 12-month period (Problem was not resolved after the 1<sup>st</sup> Level 1 Assessment);
- 3) When the required repeat samples are not collected, or are not collected in a timely manner, after a routine sample is E. coli-positive.

## Increased Monitoring

Systems on quarterly monitoring can get increased to monthly monitoring if they meet any of the criteria listed in Table A. These systems can then get reduced back to quarterly if all of the criteria listed in Table B are met.

### Table A. My routine monitoring will increase to monthly if my system:

- 1) Triggers a Level 2 Assessment;
- 2) Triggers two Level 1 Assessments within 12 months;
- 3) Has an E. coli MCL violation;
- 4) Has a coliform treatment technique violation;
- 5) Has two RTCR monitoring violations within 12 months;
- 6) Triggers a Level 1 Assessment and an RTCR monitoring violation within 12 months

***The increase to monthly would only affect seasonal PWSs on quarterly monitoring for at least one quarter.***

### Table B. My system could return to quarterly monitoring if all of the following criteria are met:

- 1) Sanitary survey, site visit, or Level 2 Assessment within the past 12 months;
- 2) 12 months of clean compliance history;
- 3) No significant deficiencies;
- 4) Protected source water;
- 5) Valid License to Operate;
- 6) No outstanding violations of the following: nitrate/nitrite (MCL or monitoring), source water monitoring, treatment technique requirements, operational requirements;
- 7) Approved Sample Siting Plan

***Depressurized or partially-depressurized seasonal PWSs cannot monitor quarterly, even if the above criteria are met.***

## Contact

For more information, visit: <http://epa.ohio.gov/ddagw/rtrcr.aspx> or contact your inspector in the appropriate District Office:

**Northwest:** 419-352-8461

**Northeast:** 330-963-1200

**Central:** 614-728-3778

**Southwest:** 937-285-6357

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