



The Revised Total Coliform Rule: Small Noncommunity Public Water Systems

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

This fact sheet intends to explain key requirements under the Revised Total Coliform Rule for small 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 and the way that public water systems (PWSs) must respond when samples show that total coliform bacteria (TC) are present. 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>

Sample Siting Plan

All systems must update their Sample Siting Plan for TC monitoring. Templates for revising the plan are available at:

<http://epa.ohio.gov/ddagw/rtrcr.aspx>

Increase to Monthly Monitoring

PWSs will start on quarterly monitoring, but can get put on monthly monitoring if the 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; or
- 6) Triggers a Level 1 Assessment and an RTCR monitoring violation within 12 months

Key Changes

- 1) Within 24 hours of being notified, systems are required to collect 3 repeat samples for each TC+ routine sample, unless an extension is justified.
- 2) Number of temporary routine samples in the month following a TC+ routine sample is reduced from 5 to 3.
- 3) Total coliform positive samples may trigger an assessment to find and fix the cause.
- 4) Maximum Contaminant Level (MCL) for total coliform has been eliminated.
- 5) New MCL for E. coli

These systems may be reduced from monthly to quarterly 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/nitrate (MCL or monitoring), source water monitoring, treatment technique requirements, operational requirements;

What happens if a routine sample is TC+ ?

Number - 3 (instead of 4) repeat samples must be taken for each TC+ routine sample.

Timing - **Must be taken within 24 hours of notification**, unless an extension is justified.

Locations - Similar as in the past, as identified in your Sample Siting Plan:

- One at the TC+ location, and
- One within five taps upstream, and
- One within five taps downstream.

The Revised Total Coliform Rule: Small Noncommunity Public Water Systems

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 sample 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 trigger happens within a 12-month period (Problem was not resolved after the 1st 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.

Temporary Routine Sample Requirements

Systems on quarterly monitoring are required to collect 3 temporary 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 can be collected on the same day.
- If the samples are collected from the same tap, they must 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.

Tips

- **Timing is important.** Have extra bottles on hand to collect 3 repeat samples as soon as you are notified by either the laboratory and/or Ohio EPA that a routine sample is TC+.
- **Be thoroughly familiar with how to properly collect a TC sample.** If you arrange for someone else to collect your samples, please be certain the person or company is thoroughly familiar with the rule revisions.
- **The PWS is ultimately responsible for complying with the RTCR requirements.**

Sample Submission Report

The location of the sample is critical under the RTCR. The sample location on the Sample Submission Report must match the sample location listed in the system’s Sample Siting Plan. Wrong location = Monitoring violation.

The PWS must include the following information in the comment box of the Sample Submission Report, if applicable:

- Reason for an extension of the 24 hour repeat sample collection requirement (if any)
- “GWR001” (if required to submit a raw source water sample)
- “Confirmatory GWR001” (if confirmatory samples are required following an E. coli-positive from a raw source)

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

Southeast: 740-385-8501