



The Revised Total Coliform Rule for Laboratories

This fact sheet intends to explain key requirements under the Revised Total Coliform Rule (RTCR) for laboratories. It is not a complete summary of the requirements.

What is the Revised Total Coliform Rule (RTCR)?

The Revised Total Coliform Rule took effect on April 1, 2016. It changed the monitoring and response requirements for total coliform bacteria (TC). 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.

Routine Sample Requirements

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.
- The system operates seasonally. Consult “The Revised Total Coliform Rule: Seasonal Public Water Systems” fact sheet or contact the appropriate Ohio EPA District Office for more information.

Routine samples must be collected from the location(s) noted on the system’s Sample Siting Plan.

Repeat Sample Requirements

- Systems must collect 3 repeat samples for **each** routine TC+ (e.g., 3 routine TC+ = 9 repeat samples).
- **Systems should not chlorinate the well prior to collecting repeat samples.**
- Repeat samples must be collected within 24 hours of water system notification, unless an extension is justified due to specific circumstances (e.g., no sample bottles available due to lab closure, 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 Sample Submission Report.
- All 3 repeat samples must be collected on the same day from the location(s) noted on the system’s Sample Siting Plan.

Source Water Sample Requirements

Ground water systems that have more than one well or have any treatment beyond a cartridge filter or water softener, are considered substantial systems. If substantial systems have a TC+ routine sample, they are required to collect a raw, source water sample (before any treatment) from each well that was in use when the TC+ routine sample was collected. These samples should usually be marked as follows:

- Sample Type = **Triggered**
- Facility ID (Facility Code) = **Treatment Plant ID/STU**. This is a 6 or 7 digit number assigned to the facility.
- Sample Monitoring Point = **GWR00X**. The “X” corresponds to the specific plant Facility ID. If there is only one treatment plant for the facility, then the “X” should default to 1 (e.g., GWR001).

Temporary Routine Sample Requirements

Systems that monitor **quarterly** for total coliform are required to collect three (3) routine samples during the month following a TC+ routine sample. The samples must be collected one of the following ways:

1. **3 Different Taps** = Collect all three (3) samples on the **same day** from three (3) different taps.

Laboratory Recommendations

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

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2. **3 Different Days** = Collect one (1) sample per day on three (3) **different days**. The days must be evenly spaced throughout the month (e.g., 1 sample the first week, 1 sample the second week, 1 sample the third week).

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

Sample Siting Plan

All public water systems must update their Total Coliform Sample Siting Plan. Templates are available online at: <http://epa.ohio.gov/ddagw/rtrcr.aspx>. The locations of routine, repeat, source water, and seasonal start-up 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.

Seasonal System Start-Up Requirements

Depressurized and partially-depressurized seasonal systems are required to complete the start-up procedure every year prior to serving water to the public. The procedure includes completing the “Seasonal Public Water System Start-Up Requirements and Checklist” (a.k.a. “Start-Up Checklist”), collecting at least one “start-up” sample, and submitting the “Seasonal Start-Up Certification Form.” The “Seasonal 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.**

Submit the start-up sample to Ohio EPA as follows:

- Sample Type = **Special**
- Sample Monitoring Point = **SUP01**
- Facility Code = **DS1**
- Comments = **“Start-Up”**

If the “Start-Up” sample is TC-negative, the PWS can complete and submit the “Seasonal 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. The PWS must have at least two TC-negative samples collected at least 24 hours apart before the system can submit the “Seasonal Start-Up Certification Form” and begin serving water to the public.

Sample Submission Reports

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 should include the following, as applicable:

- Reason for an extension of the 24-hour repeat sample collection requirement
- “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)

Reporting Deadlines

Any TC+, any E. Coli+, and any repeat sample results (TC+ or TC-) are required to be reported to the PWS and electronically to Ohio EPA by the end of the next business day following completion of the analysis. For other reporting deadlines related to the RTRCR, please reference the Reporting Tips for Laboratories document:

<http://www.epa.state.oh.us/portals/28/documents/reporting/ReportingTips.pdf>

Violations and Treatment Technique Triggers

- TC+ samples may trigger a Level 1 or Level 2 Assessment to find and fix the cause.
- Maximum contaminant level (MCL) violation for E. coli will trigger a more intensive, Level 2 Assessment.

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