



The Revised Total Coliform Rule: Large Noncommunity, Surface Water and Community Public Water Systems

This fact sheet intends to explain key requirements under the Revised Total Coliform Rule (RTCR) for all community public water systems (PWSs), all surface water PWSs, and noncommunity ground water PWSs serving more than 1,000 people. 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>

Routine Monitoring

All systems will stay on the same routine monitoring schedule, unless their population changes.

24-Hour Deadline for Repeat Monitoring and Source Water Monitoring

All public water systems must have repeat samples collected within 24 hours of notification of the positive result, 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). All extensions must be thoroughly documented.

Ground water systems may also be required to collect a source water sample within 24 hours. Source water sampling is required if the system has more than one (1) well, or it has any treatment beyond a cartridge filter and/or water softener. A source water sample must be collected from each well that was in service when the TC-positive routine sample was collected. The sample must be collected from a sample tap before any treatment.

What happens if we have a TC-positive sample?

- **Number** - Collect **three (3)** repeat samples for **each** TC-positive routine sample (e.g., 2 TC+ routines = 6 repeats). If applicable, also collect the required source water sample(s).
- **Timing** - **Must be collected within 24 hours of notification, unless an extension is justified.**
- **Locations** - Collect the samples from the locations identified in your Sample Siting Plan:
 - One at the original TC-positive location,
 - One within five taps upstream (closer to the well/source), and
 - One within five taps downstream (further from the well/source).

Do we need to collect any additional samples the month following a routine TC-positive sample?

No, unless specified by Ohio EPA. Most systems will return to their normal routine monitoring schedule the month following a TC-positive sample.

What is a Level 1 Assessment? Who has to do it?

- A Level 1 Assessment is a basic examination of the entire water system, including sampling practices, to try to identify the cause of the TC-positive sample(s).

Key Requirements

- All systems will stay on the same routine monitoring schedule, unless their population changes.
- Systems must collect three (3) repeat samples, and the source water sample(s) (if applicable) within 24 hours of notification.
- TC-positive samples may trigger an assessment to find and fix the cause.
- An E. coli maximum contaminant level violation will trigger a more intensive assessment.
- All systems must update their Total Coliform Sample Siting Plan. The general template is available at: <http://epa.ohio.gov/ddagw/rtrcr.aspx>

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What is a Level 1 Assessment? Who has to do it? (continued)

- A Level 1 Assessment examines the:
 - Source
 - Sampling location and procedures
 - Operational practices
 - Distribution system changes or upsets
 - Treatment system changes or upsets
- The water system is responsible for ensuring the assessment is completed. Contact Ohio EPA for assistance.
- The assessment must be documented.
- **Triggering a Level 1 Assessment is not a violation! However, not completing it within 30 days is a violation.**
- After the assessment is complete, all identified deficiencies or significant deficiencies must be completed in accordance with the approved corrective action plan.
- **Failure to comply with the corrective action plan will result in a treatment technique violation.**

What is a Level 2 Assessment? Who has to do it?

- A Level 2 Assessment is a more in-depth examination of the entire water system.
- It will be conducted on-site by Ohio EPA staff with participation from water system personnel.
- After the assessment is complete, all identified deficiencies or significant deficiencies must be completed in accordance with the approved corrective action plan.
- **Failure to comply with the corrective action plan will result in a treatment technique violation.**

What triggers a Level 1 Assessment?	What triggers a Level 2 Assessment?
1) When the required repeats samples are not collected, or are not collected in a timely manner, after a routine sample is TC-positive (E. coli-negative).	1) E. coli maximum contaminant level violation;
2) Population <33,001 = 2 or more TC-positive samples during the same month;	2) A second Level 1 Assessment is triggered within a 12-month period (Problem was not resolved after the 1 st Level 1 Assessment);
3) Population >33,000 = the number of TC-positive samples exceeds 5.0% of the total monthly samples.	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.

Seasonal Systems

All depressurized and partially-depressurized seasonal PWSs are required to complete the start-up procedure every year prior to serving water to the public. Consult “The Revised Total Coliform Rule: Seasonal Public Water Systems” fact sheet or contact the appropriate Ohio EPA District Office for more information. This requirement **does not** apply to community water systems that have seasonal systems as service connections.

Sample Siting Plan

All public water systems must update their Total Coliform Sample Siting Plan. Sample Siting Plan templates are available online at: <http://epa.ohio.gov/ddagw/rtrcr.aspx>. Seasonal public water systems must use the “Seasonal Total Coliform Sample Siting Plan Template.” All other public water system can use the “General Total Coliform Sample Siting Plan Template.” The physical locations of routine, repeat, and source water samples (if applicable) noted in the Sample Siting Plan must match the locations listed on the Sample Submission Report (SSR). **NOTE:** Water systems that do not conduct their monitoring in accordance with their written Sample Siting Plan can incur a monitoring violation.

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