

WHAT IS THIS RTCR?

By Randy Hellbusch, Circuit Rider

One of the major regulatory changes affecting public water supply systems is the Revised Total Coliform Rule. The rule change is set to take effect in April 2016. Many operators that I have visited with recently are aware there are changes coming, but aren't sure what the changes are or how they will be affected. I have heard everything from operators thinking they will no longer need to sample coliform to operators thinking that everyone is going to have to chlorinate. Of course, both statements are far from the truth.

The rule does affect two things almost all operators despise the most: public notification and paper work. The good news is there will probably be a lot less public notification. The public notification will not be required for Total Coliform Routine + samples and Repeat TC+ samples. The bad news however, is that TC + samples will dictate more paper work. All systems will be required to conduct an assessment when results show a system is vulnerable to possible contamination (+Coliform samples).

A level 1 assessment will be required when a system has multiple TC+ samples in any monitoring period but no Ecoli + samples or failure to take every required sample in a monitoring period. Level 1 assessments will be much like what is now referred to as a limited checklist from what I have heard. A level 1 assessment can be completed by the operator of the water system. The assessment should be done as soon as possible but at least within 30 days. Any defect found during the assessment must be addressed and corrected in a timely fashion.

A level 2 assessment will be required when a system has an Ecoli violation. This assessment is considerably more detailed and will be conducted by your DHHS field rep. Additional sampling, inspections, etc. may also be required.

Now, when do I need to notify the public?

No Notification - IF:

TC+ followed by TC+

Tier 1 Notification (24 hrs) - IF:

Routine TC+ followed by EC+ sample, Routine EC+ followed by TC+ sample, Routine EC+ sample and failure to take repeat samples

Tier 2 Notification (30 days) - IF:

Failure to conduct Assessment in required timeframe, Failure to complete corrective action in required time frame

Tier 3 Notification (1 yr) - IF:

Failure to collect all required samples, Failure to submit/late reporting of assessments.

In short, TC+ samples will require an assessment and the system is encouraged to FIND and FIX any possible means of contamination. EC+ samples will require public notification.

This data was taken from a presentation by EPA region 8. NDHHS requirements may vary slightly. If you have any questions or concerns I urge you to call your NDHHS field representative or NeRWA.