



Fact Sheet: Announcement of Proposed Revisions to Total Coliform Rule

The Environmental Protection Agency (EPA) is proposing revisions to the 1989 Total Coliform Rule (TCR), a national primary drinking water regulation (NPDWR). The purpose of the TCR is to protect public health by ensuring the integrity of the drinking water distribution system and monitoring for the presence of microbial contamination. EPA anticipates greater public health protection under the proposed revised requirements, which are based on recommendations by a federal advisory committee. The proposed revisions to the TCR will:

- require public water systems that are vulnerable to microbial contamination to identify and fix problems, and
- establish criteria for systems to qualify for and stay on reduced monitoring, thereby providing incentives for improved water system operation.

Questions and Answers

Where can I find the revisions? (link to <http://www.epa.gov/safewater/disinfection/tcr/regulation.html>)

What are the basic requirements of the TCR?

Who will be affected by this proposed rule?

Why did EPA decide to revise the 1989 TCR?

How did EPA identify the changes to the TCR?

How have monitoring frequencies changed?

How has the standard for total coliform changed?

How has the public notification requirement changed?

How much will the proposed rule cost water suppliers and consumers?

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What are the basic requirements of the TCR?

The current TCR (published in 1989) continues to be the only microbial drinking water regulation that applies to all public water systems. Systems are required to meet legal limits (i.e. Maximum Contaminant Levels (MCL)) for total coliforms, including fecal coliforms, as determined by monthly monitoring. The TCR specifies the frequency and timing of the monthly microbial testing by water systems based on population served. The rule also requires public notification as indicated by monitoring results.

Who will be affected by this proposed rule?

The entities potentially affected by this proposed rule are public water systems that are classified as community water systems (e.g., systems that provide water to year-round residents in places like homes or apartment buildings) or non-community water systems (e.g., systems that provide water to people in locations such as schools, office buildings, restaurants, etc.); state primacy agencies; and local and tribal governments. As with the current TCR, the proposed RTCR will impact approximately 154,000 PWSs. These water systems serve approximately 307 million individuals.

Why did EPA decide to revise the 1989 TCR?

The Safe Drinking Water Act, as amended, requires EPA to review and revise, as appropriate, each NPDWR not less often than every six years. The outcome of the review of the TCR determined that there was an opportunity to reduce implementation burden and to improve rule effectiveness, and that a Revised Total Coliform Rule (RTCR) offers an opportunity for greater public health protection against waterborne pathogens in the public drinking water distribution systems.

How did EPA identify the changes to the TCR?

EPA established a federal advisory committee called the Total Coliform Rule Distribution System Advisory Committee in 2007 to recommend revisions to the TCR. The Committee was comprised of a balanced panel of 15 key stakeholder organizations, including EPA, states and tribal representatives, utility associations, and advocacy groups for environment, public health, epidemiology, and consumers. The Committee signed an Agreement in Principle (AIP) outlining its recommendations in 2008. The draft proposed rule is being developed to be consistent with the AIP.

How have monitoring frequencies changed?

The proposed rule links monitoring frequency to water quality and system performance:

- Provides criteria that well-operated small systems must meet to qualify and stay on reduced monitoring
- Requires increased monitoring for high-risk small systems with unacceptable compliance history
- Requires some new monitoring requirements for seasonal systems such as state and national parks

How has the standard for total coliform changed?

The proposed rule establishes a health goal (Maximum Contaminant Level Goal, or MCLG) and an MCL for *E. coli* and eliminates the MCLG and MCL for total coliform, replacing it with a treatment technique for coliform that requires assessment and corrective action.

- The proposed rule is establishing an MCLG and an MCL of 0 for *E. coli*, a more specific indicator of fecal contamination and potential harmful pathogens than total coliform. EPA is proposing to remove the current MCLG and MCL of zero for total coliform. Many of the organisms detected by total coliform methods are not of fecal origin and do not have any direct public health implication.
- Under the proposed treatment technique for coliform, total coliform serves as an indicator of a potential pathway of contamination into the distribution system. A PWS that exceeds a specified frequency of total coliform occurrence must conduct an assessment to determine if any sanitary defects exist and, if found, correct them. In

- addition, under the proposed treatment technique requirements, a PWS that incurs an *E. coli* MCL violation must conduct an assessment and correct any sanitary defects found.

How has the public notification requirement changed?

The proposed rule is eliminating monthly public notification requirements based only on the presence of total coliforms. Total coliforms in the distribution system may indicate a potential pathway for contamination but in and of themselves do not indicate a health threat. Instead, the proposed rule requires public notification when an *E. coli* MCL violation occurs, indicating a potential health threat, or when a PWS fails to conduct the required assessment and corrective action.

How much will the proposed rule cost water suppliers and consumers?

The estimated net incremental cost of the proposal is \$14 million annually. This represents total increased costs relative to current TCR provisions. PWSs are estimated to incur approximately 97 percent of the proposed rule's net annualized present value costs. States/primacy agencies incur the remaining costs.

What are the next steps?

The public can provide comments on the proposed rule up until 60 days after it is published. EPA will consider the public comments and/or any new, relevant, peer-reviewed data submitted as it develops a final Revised Total Coliform Rule.

How can I get more information?

For additional information about the rule, contact:

- Sean Conley (phone (202) 564-1781; [e-mail: conley.sean@epa.gov](mailto:conley.sean@epa.gov)), or
- Thomas Grubbs (phone: (202) 564-5262; [e-mail: grubbs.thomas@epa.gov](mailto:grubbs.thomas@epa.gov)).

You may also visit the EPA internet Web site,
<http://www.epa.gov/safewater/disinfection/tcr/regulation.html>.

For general information on drinking water, please visit the EPA Safewater Web site at www.epa.gov/safewater or contact the Safe Drinking Water Hotline at 1-800-426-4791. Local or international calls can reach the Hotline at 703-412-3330. The Safe Drinking Water Hotline is open Monday through Friday, excluding legal holidays, from 10:00 a.m. to 4:00 p.m. Eastern time.