



EPA Region 8 Drinking Water Unit - Tips for Systems in WY and Indian country: How to Stay in Compliance with Monitoring

Drinking Water System Operations in Wyoming and on Tribal Lands in EPA Region 8 Website

(<https://www.epa.gov/region8-waterops>) - EPA Region 8's website provides a wealth of resources and information on various topics, including emergency preparedness (e.g., what to do for loss of pressure, boil water advisory template), reporting forms and instructions, rule information and guidance, steps to preparing public notice, the regulated analytes list, sample collection information, technical tips, and copies of training presentations. There is also a link to Drinking Water Watch (DWW) which provides information about water system specific sampling requirements and results at <https://sdwizr8.epa.gov/Region8DWWPUB/>.

Emergencies (After Hours) - If you need to report an emergency **after hours** such as flooding, loss of a water source, contamination, loss of pressure in the distribution system, a break in, vandalism, a cybersecurity incident, or anything else that should be reported to the EPA or could require immediate public notice, call the Region 8 Emergency Drinking Water Hotline at 303-312-6327. Leave a message stating your EPA Region 8 Public Water System name and number and the issue that you are calling about. Someone will get back to you shortly.

Check your Monitoring Schedule - Monitoring and Reporting Requirements (Monitoring Schedules) are emailed to you in February of each year. This report notes all contaminants your water system must monitor for along with the required number of samples, sampling point location(s), frequency and timeframe.

- For more detailed information on your Monitoring Schedules, please refer to "Quick Guide To Drinking Water Monitoring Requirements in Wyoming and on Tribal Lands in EPA Region 8" which can be found at: <https://www.epa.gov/region8-waterops/quick-guide-drinking-water-monitoring-requirements-wyoming-and-tribal-lands-epa>.
- Suggestions: Post your Monitoring Schedule on a bulletin board in a common area; note when you have to sample on your desk or wall calendar; use a scheduler on your computer (like Outlook) to identify sampling dates and set reminders; or set a reminder on your cell phone.
- If you misplace your Monitoring Schedule, a copy can be found on Drinking Water Watch (DWW) or you can call EPA for a replacement copy. (There is more about DWW, including a link to the website, at the end of the document.)

Work with a certified lab - Once you receive your Monitoring Schedule, share it with your lab(s). Make sure the lab will be accepting samples on the days you plan to send them to the lab.

- Samples must be analyzed by labs certified by the EPA or the State, as well as certified for the analysis of the specific contaminant.
- Schedule timely receipt of the bottles you will need for the samples required, and ask for extra Revised Total Coliform Rule (RTCR) sample bottles just in case you have a total coliform (TC) positive or an *E. coli* positive and need to take repeat samples or triggered source sample(s) for the Ground Water Rule. It saves time! You only have 24 hours to collect your repeat and triggered source samples.
- Keep an eye on the weather if you have to ship your samples to the lab. If your sample has a short hold time, a weather delay could lead to the sample being rejected.

- Complete the chain-of-custody form with all relevant information and be sure to include your public water system (PWS) identification number, system name, sample collection date, and sample location(s).
- Check to see if your lab will copy EPA when they email you your results. This will save you a step! But ultimately, you are responsible for making sure that EPA receives your sample results.

Check your email for messages from EPA - Every month EPA sends out an email reminder to each water system's administrative contact about the chemical contaminants (disinfection byproducts, nitrates, nitrites, lead, copper, arsenic, inorganics, organics, asbestos) and radionuclides that remain to be collected during the monitoring period.

- In the Drinking Water Watch (DWW) page for your water system, click the link for the "Sample Schedules, Reminders and ChemRad Sample Form" to print out your water system's chemical sample form showing the contaminants that still need to be sampled for this monitoring period. Submit this form to the lab with your samples as it contains helpful information about the contaminants to analyze.

When to Sample and When to Report Results to EPA - ALWAYS sample as early in the month or monitoring period as you can. This way, if a sample is lost or exceeds a holding time, you will still have time to collect another sample before the weekend or end of the month. This is an easy way to avoid a violation.

- If the lab is not copying EPA on your sample results, send the results to EPA as soon as you receive them. This way you can avoid getting a violation for failure to monitor or failure to report. **Tip:** Total coliform results are due to EPA by the 10th of the month following the month you sampled. Meaning, if a sample is collected in the calendar month of June, the results must be reported to EPA by July 10th or it will result in a failure to monitor violation. If total coliform results are received by EPA after the 10th of the following month you may receive a Reporting Violation. For all other samples, send results to EPA as soon as you receive them from the lab.
- Sample results should be emailed to: R8DWU@epa.gov or faxed to: 1-877-876-9101

Where to Sample – Collect your samples according to the water system's Monitoring Schedules and Schematic or Sample Siting Plan during the correct time period and at the correct location(s). Some samples must be collected at the entry point to the distribution system while others must be collected within the distribution system. Use your EPA reviewed sampling/monitoring plans for samples collected within the distribution system.

Revised Total Coliform Rule (RTCR)

- **Anytime you have an *E. coli* positive (EC+) sample result you must call EPA IMMEDIATELY at 303-312-6072 and ask for the RTCR Manager and take repeat RTCR samples, as well as Ground Water Rule source sample(s) (if applicable) within 24 hours.** If you have an **AFTER HOURS** or weekend drinking water **emergency**, call EPA at 303-312-6327 immediately.
- If you have a TC Positive but an *E. Coli* Negative, follow the 5 steps outlined in "EPA Region 8 Drinking Water Unit Tech Tips for WY & Tribal Systems Follow-up to a Total Coliform Positive (TC+) or *E. Coli* (EC+) Sample" which can be found at <https://www.epa.gov/region8-waterops/epa-region-8-drinking-water-unit-tech-tips-wy-tribal-systems-follow-total-coliform>.
- Things to avoid when sampling (if possible): new faucets or newly repaired faucets; leaky faucets; outdoor faucets; those faucets connected to softeners, hot water heaters, or pressure tanks; setting down the

bottle lid or exposing the inside of the lid or bottle to anything other than the sample water (do not rinse or remove powder); and rushing your sample collection. RTCR samples must be taken at specified locations throughout the distribution system as designated by your Sample Siting Plan.

- If access to a total coliform sample site changes, you are required to notify EPA immediately and update your sampling/monitoring plan right away and submit it to EPA.

Ground Water Rule (GWR) - Triggered Groundwater Monitoring

- Within 24 hours of a TC+ or EC+, **collect 1 fecal indicator sample (e.g., *E. coli*)** for EACH routine positive TC or EC sample, as close to the source as possible, prior to any treatment, at the well sample tap(s) or spring collection box (as appropriate) for each of the groundwater source(s) in use on the day when the routine RTCR positive TC sample was collected.
- In addition to your regular lab form, please use the Triggered Monitoring Sample Form and mark the sample(s) as GWR Triggered (TG) with the correct Sample Point Code. Include the date collected on the lab chain of custody form. The Sample Point Code may be found on your Monitoring Schedule. If applicable, please indicate in the Comments section of the Triggered Monitoring Sample Form all groundwater source(s) **not** in use on the day of the positive TC sample and for which you did not collect a sample. The Triggered Monitoring Sample Form can be found at: <https://www.epa.gov/region8-waterops/wyoming-and-tribal-triggered-groundwater-source-sampling-form>.

Nitrate and Nitrite Rule

- You must sample at every entry point to the distribution system which is representative of each source after treatment during periods of normal operating conditions. Sample according to your Monitoring Schedule and system schematic.
- As soon as possible, or no later than the 10th of the month following the month that you receive your results, submit nitrate and nitrite sample results to the EPA.
- **Nitrate and nitrite are acute contaminants.** If a nitrate sample result is over 10 mg/L or a nitrite sample result is over 1 mg/L a confirmation sample must be collected within 24 hours of notification of exceedance and call EPA IMMEDIATELY at 303-312-6791 during normal business hours. If the notification is received after hours, call EPA IMMEDIATELY at 303-312-6327.

Surface Water Treatment Rule (SWTR)

- For compliance guidance, please refer to your Monitoring Schedule and the EPA Region 8 SWTR Fact Sheet located at: <https://www.epa.gov/region8-waterops/swtr-fact-sheet-epa-region-8>.

Disinfection Byproducts Rule (DBPR)

- Sample according to your approved monitoring plan – you can also find what month(s) you are required to monitor and sampling locations on your Monitoring Schedule. Ensure that the sample is collected after enough water has been flushed to be representative of the water main at the approved sample location.
- If your system is on quarterly monitoring, submit your sample results and your Stage 2 Locational Running Annual Average (LRAA) Operational Evaluation Level (OEL) forms (applicable to quarterly sampling) as a package as soon as you receive the results from your lab or no later than the 10th of the month following the quarter you sampled.

- If your system is on annual or triennial monitoring, submit your sample results as soon as you receive the results from your lab or no later than the 10th of the month after you collected the sample.

Lead and Copper Rule

- Sample according to your Monitoring Schedule, as lead and copper samples collected outside the monitoring period cannot be accepted for compliance. If you do not have to sample this year, your Monitoring Schedule will tell you that.
- Sample early in the monitoring period so you have time to collect Water Quality Parameters if you have an Action Level Exceedance.
- Sample only at sites that are listed on your Tap Sample Site Plan (TSSP), which must be on file with EPA before you begin collecting samples. If you need assistance determining your site tiers, or with TSSP forms please contact the Lead and Copper Rule Manager at 303-312-6876 or go to <https://www.epa.gov/region8-waterops/lead-and-copper-tap-sample-site-plan>.
- **Always** collect a first-draw sample from a regularly used tap where the water has stood in the pipes for at least 6 hours. Collect samples from a kitchen or bathroom cold water tap that is used for drinking water consumption. Avoid sample locations that have been vacant for weeks or months, and exterior taps such as hose bibs. For instructions to provide homeowners on how to collect lead and copper samples see <https://www.epa.gov/region8-waterops/lead-and-copper-suggested-directions-homeowner-tap-sample-collection-procedures>.
- Sample results **must** be reported to EPA no later than the 10th day of the month following the month that you receive your results.
- If you have a 90th percentile result higher than 0.015 mg/L for lead or 1.3 mg/L for copper, call the Lead and Copper Rule Manager as soon as possible at 303-312-6876.
- Report sampling results to customers at the locations where samples were collected within 30 days of getting your results back from the lab using the Lead Copper Consumer Notice forms, available on the EPA website at <https://www.epa.gov/region8-waterops/lead-consumer-notice-certification-form> and at <https://www.epa.gov/region8-waterops/notice-lead-tap-water-results>, or from the Lead and Copper Rule Manager listed on the first page of the Monitoring Schedule. The Certification and a copy of one LCR Consumer Notification Form - Notice of Lead Tap Water Results are due to EPA no later than 90 days after the end of the monitoring period.

Phase II/V Chemical Rules (inorganics, volatile organics, synthetic organics) and the Arsenic Rule

- Sample at every entry point to the distribution system which is representative of each source after treatment during periods of normal operating conditions. Sample according to your Monitoring Schedule and the system schematic.
- Pay special attention to sample collection procedures, especially for volatile organic chemicals which require the absence of air space in volatile organic analysis (VOA) glass bottles. If any bottle contains a preservative, do not rinse the bottle.
- Make sure chemicals like gasoline, pesticides, oils, solvents, etc. are not stored near the sample point to avoid potential cross contamination impacts on the samples.
- Samples analyzed for the presence of chemicals must be analyzed by labs certified by EPA or the State, as well as certified for the analysis of the contaminants for which you sampled.

- Submit the results to the EPA as soon as possible but within the first ten days following the month in which you receive your results.

Phase II/V Chemical Rules (asbestos)

- Depending on the required monitoring schedule, samples are collected at either (1) the entry point to the distribution system which is representative of each source after treatment during periods of normal operating conditions or (2) within the distribution system at a tap served by asbestos concrete pipe.
- Ship samples to the lab as instructed and as soon as they are collected. The hold time for asbestos samples is only 48 hours, so shipping arrangements should be carefully made in advance to ensure the sample arrives at the laboratory within the allotted hold time and avoids the necessity to resample.
- Submit the results to the EPA as soon as possible but within the first ten days following the month in which you receive your results.

Thank you for all you do to help ensure clean drinking water in Wyoming and Indian country!