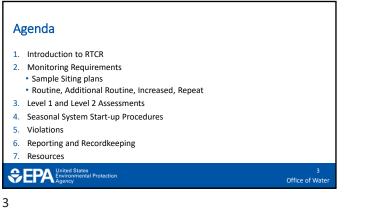


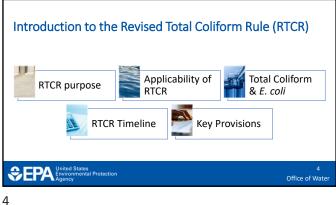
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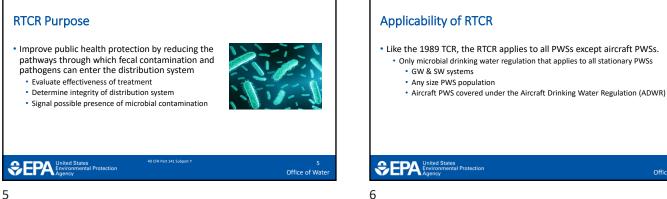
The examples included in this presentation are intended for discussion purposes only. Throughout this presentation, the terms "state" or "states" are used to refer to all types of primacy agencies including U.S. territories, Indian tribes, and the EPA Regions. The statutory provisions and the EPA regulation is doscribed in this document contain legally binding requirements. This presentation is not a regulation itself, nor does it change or substitute for those provisions and regulations. Thus, it does not impose legally binding requirements on the EPA, states, or public water systems. This guidance does not confer legal rights or impose legal obligations upon any member of the public. While the EPA has made every effort to ensure the accuracy of the discussion in this presentation, the obligations of the regulated community are determined by statutes, regulations, or other legally binding requirements. In the event of a conflict between the discussion in this presentation and any statute or regulation, this presentation would not be controlling.

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Total Coliform and E. coli

- Total coliform & E. coli as indicators of potential risk
 - Total coliform are a group of closely related bacteria that, with a few exceptions, are not harmful to humans
- exceptions, are not harmful to numans E. coli bacteria are a more accurate indicator of fecal contamination, though not a measure of waterborne pathogen occurrence The presence of total coliform is a good indicator of a potential pathway of microbial contamination into the distribution system

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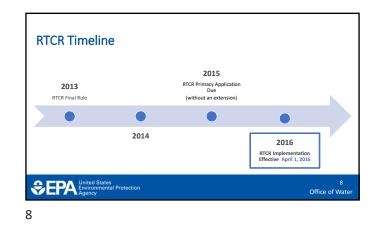
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- These contaminants could include: Bacteria
 - Viruses
 - Parasitic protozoa

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Key Provisions: Assessment and Corrective Action

- · Requires investigation and correction of sanitary defects
- Requires assessments when monitoring results show the system may be vulnerable to contamination
- Level 1 self-assessment unless the state determines otherwise
- · Level 2 more detailed assessment by the state or by a party approved by the state
- Systems required to correct sanitary defects found through either Level 1 or 2 assessments conducted
- · Failure to assess and correct is a Treatment Technique (TT) violation

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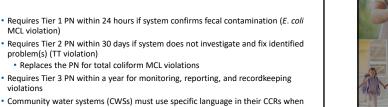
Key Provisions: MCL and TT

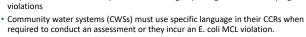
- Establishes MCLG and MCL for E. coli
 - MCLG = the maximum level of a contaminant in drinking water at which no known or anticipated adverse effect on the health of persons would occur, allowing an adequate margin of safety.
 - MCL = highest allowable concentration of a contaminant Compliance based on sampling results
- Establishes a total coliform TT requirement
 - TT = process intended to reduce the level of a contaminant in drinking water Compliance based on performing activities

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141.860; 40 CFR Subpart O

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MCL violation)

Key Provisions: Public Notification



Sample Siting Plans

- Systems must:
 - Develop sample siting plans
 - Collect samples in accordance with the plan
 - · Submit plan to the state if proposing to use alternative sampling locations for repeat samples
 - · Get written state approval of the plan before using dual purpose sampling sites
- All plans are subject to state review and revision
- Must have been developed by April 1, 2016

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Sample Siting Plans

- Systems must include sampling locations
 - Must be representative of the water in the distribution system • On the premises, OR
 - Dedicated sampling station, OR
 - Other designated compliance sampling location
 - Routine and repeat monitoring locations
 - All applicable GWR monitoring sites (in states where dual purpose sampling is allowed)

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Sample Siting Plan: State role?

- Sample siting plans are subject to state <u>review and revision</u>
- Sample Siting Plans must be <u>approved</u> by the state:
 - Repeat alternative sampling locations [40 CFR 141.853(a)5(i)]

 Alternative fixed locations or criteria written in an SOP based on a situational basis
 - ✓ PWS must submit to the state prior to use

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- PWS can use these locations prior to state approval Seasonal systems not monitoring monthly [40 CFR 141.854(i)2(i)]
 - PWS must submit and gain state approval prior to use
 - Plan must designate monitoring time period
- Dual purpose sampling (eligible ground water systems) if state adopted [40 CFR 141.853(a)5(ii)]

R 141.853(a)(5

PWS must submit and gain state approval prior to use

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Monitoring: Types of RTCR Compliance Samples

- Routine samples:
- Collect each monitoring period
- "Additional" routine samples
 - For PWSs sampling less than monthly (e.g., quarterly, annual)
- Repeat samples:
 - · Collect when a routine or repeat sample is TC+
 - · Dual Purpose GWR sampling: If the state adopted

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Collecting more samples than the minimum requirements:

• If a PWS wishes to take more compliance samples than required, those samples must be included in the sample siting plan

The extra compliance sample(s) must be used to calculate coliform TT-trigger exceedances Considerations for when a small PWS may wish to take more than the minimum required compliance samples:

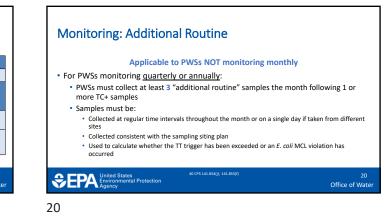
- More than one pressure zone with separate sources in each pressure zone
- · Long distance (more than 2 miles) between connections within the distribution system, or other situations leading to stagnant water. This is especially important in areas with small populations or large pipe diameters
- · Isolated sub-populations in separate pressure zones associated with large storage tanks

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Frequencies: Routine Monitoring

- For NCWS GW < 1,000 people
 Monthly
 Quarterly
- Annual
 Seasonal systems (monthly unless state reduces, must meet specific criteria)
- CWS GW < 1,000 people Monthly (state may reduce, if meet criteria)
- All SW Systems
- Monthly
- All PWS serving >1,000 people Monthly
- SEPA United States Environmental Protection FR Parts 141.854; 141.8 141.856; § 141.857

System Type	Increased	Baseline	Reduced	NOTE
CWS	NA	1 / month	1 / quarter	Same frequency under the TCR
Non-Seasonal NCWS		1 / quarter	1 / year	Same frequency under the TCR For annual – site visit or voluntary Level 2 assessment in 1st and subsequent years
Seasonal N.			1 / quarter or	For quarterly – identify vulnerable period for monitoring
	NA 1 / month	1 / year	For annual – identify vulnerable period for monitoring and site visit or voluntary Level 2 assessment in 1 st and subsequent years	



Monitoring: Repeat Samples • For each routine TC+, collect 3 repeat samples (a set) within 24hrs of being notified of the positive result (state may extend the 24-hour limit on a caseby-case basis) Location = original site, 5 connections upstream, 5 connections downstream, or alternative sample locations (identified in Sample Siting Plan) Collect at least one round (3 repeats) for each routine TC+, even if PWS triggered an assessment earlier in the month tes SEPA # Office of Wate 21

Repeat Monitoring Requirements [40 CFR 141.858]

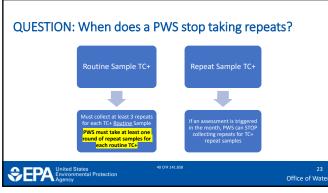
(a)(3)The system <u>must continue to collect additional sets of repeat</u> <u>samples until either total coliforms are not detected</u> in one <u>complete set of</u> repeat samples <u>or the system determines that a coliform treatment</u> technique trigger specified in § 141.859(a) has been exceeded as a result of a repeat sample being total coliform-positive and notifies the State. If a trigger identified in § 141.859 is exceeded as a result of a routine sample being total coliform-positive, systems are required to conduct only one round of repeat monitoring for each total coliform-positive routine sample

0 CFR 141.858(a

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Monitoring: Speciation

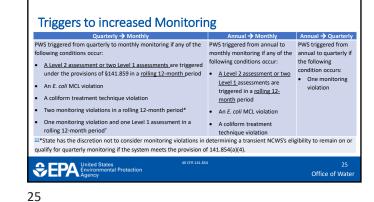
E. coli testina

• Any sample (i.e., routine or repeat) that is TC+ must be further tested for E. coli

**Results of all routine and repeat samples must be included in the determination of whether an assessment has been triggered.

NOTE: Failure to analyze repeat TC+ for EC = E.coli MCL violation

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Purpose of Assessments

- All systems required to conduct an assessment when monitoring results show that the system may be vulnerable to contamination
- · An assessment is an evaluation to identify sanitary defects
- More proactive approach to public health protection compared to TCR · Conditions that defined a non-acute MCL violation under TCR are now used to trigger assessment

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Sanitary Defects

- A defect that could provide a pathway of entry for microbial contamination into the distribution system or that is indicative of a failure or imminent failure in a barrier that is defended to be a set of the s that is already in place. For example:
 - Holes in storage tanksBreaks in pipes

 - Cracks in well seals or casings
- Not linked directly to significant deficiencies under the GWR, but may overlap (depends on state program)
- The system should consult with the state regarding how to coordinate actions under the GWR and RTCR, as necessary

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Elements of Assessments

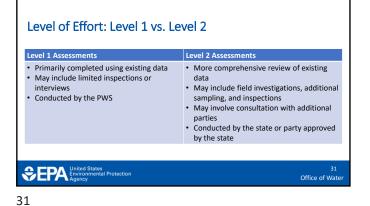
- Atypical events that may affect distributed water quality or indicate that distributed water quality was impaired
- Changes in distribution system maintenance and operation that may affect distributed water quality, including water storage
- · Source and treatment considerations that bear on distributed water quality
- · Existing water quality monitoring data
- Inadequacies in sample sites, sampling protocol, and sample processing

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Conducting Assessments

- Assessments must be:
- · Consistent with state directives
- Conducted as soon as practical after the system learns it has triggered an assessment
- Assessment form must be submitted to state within 30 days after system learned it triggered assessment
- Failure to conduct an assessment or correct sanitary defects is a TT violation and requires Tier 2 PN

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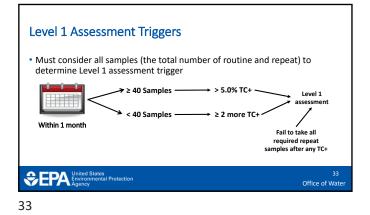


Level 1 Assessments

- General examination of the system's:
 - Source waterTreatment
 - Distribution
 - Relevant operational practices
- Intended to be a self-assessment

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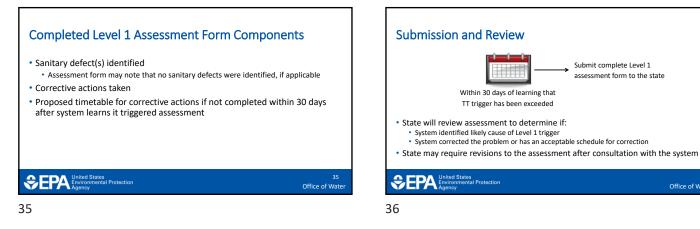


Who Conducts Level 1 Assessments? Intended to be self-assessment Atte or party approved by the state may conduct assessment Atte or system may request consultation with the other party to determine the appropriate actions to be taken Interded to the self-assessment with state requirements

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Level 2 Assessments

- More detailed examination of the system, its monitoring program and results, and its operational practices
- Triggered by events that:
 - Pose a potential immediate acute public health threat (i.e., trigger associated with the presence of *E. coli*); or,
 - Do not necessarily pose an immediate acute public health threat (i.e., a second Level 1 trigger) but may still pose a potential serious health impact because of the persistence of the contamination

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Level 2 Assessment Triggers

- Considering all compliance samples (routine and repeat) a Level 2 assessment is triggered when a system incurs:
 - A second Level 1 trigger within a rolling 12-month period
 - Unless the state has determined a likely reason that the samples that caused the first Level 1 TT trigger were TC+ and has established that the system has corrected the problem
 An E. coli MCL violation

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- AIT 2. CON WICE VIOLATION
- For systems with approved annual monitoring, a Level 2 assessment is triggered when a system incurs a Level 1 trigger in two consecutive years

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Who Conducts Level 2 Assessments?

- Must be conducted by state-approved party
 - The state
 - A third party approved by the state (which can be the PWS in cases where the system has staff or management with the required certification or qualifications specified by the state)
- Must follow state directives related to:

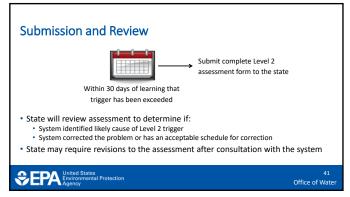
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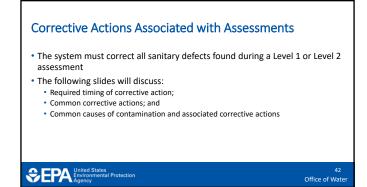
- Size and type of the water system
- · Size, type, and characteristics of distribution system

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- Level 2 assessment elements contain the same elements as the Level 1, but
 each element is investigated in greater detail
- Must include:
 - Sanitary defect(s) identified
 - Corrective actions
- Timetable for corrective actions, if not completed within 30 days after system learns it triggered assessment





Timing of Corrective Action

- System must complete corrective action: • By the time assessment form is submitted to the state, which is within 30 days of the
 - trigger; or
- · Within state-approved timeframe · System must notify the state when each scheduled corrective action is
- completed
- Either system or state can at any time request a consultation with the other party to discuss the corrective action

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Common Corrective Actions

- Well maintenance/repair
- Disinfection
- Flushing
- Replacement/repair of distribution system or storage components
- Storage facility maintenance
- Development/implementation of operations plan
- Maintenance of adequate pressure
- Training on proper sampling technique

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Common Causes of Contamination and Corrective Actions		
Common Cause	Common Corrective Action(s)	
Failure to disinfect (or improper disinfection) after maintenance work in the distribution system	Disinfection	
Main breaks	 Disinfection Replacement/repair of distribution system components 	
Holes in storage tank, inadequate screening, etc.	 Maintenance of storage facility Addition of security measures Development and implementation of an operations plan 	
Cracks in well seal, casing, etc.	Replacement/repair of well components	
CONTRACTOR United States	45 Office of Water	

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Common Causes of Contamination and Corrective Actions (cont.)			
Common Cause	Common Corrective Action(s)		
Loss of system pressure	Maintenance of adequate pressure Valve maintenance Addition or upgrade of on-line monitoring and control		
Biofilm accumulation in the distribution system	FlushingMaintenance of adequate pressure		
Cross connections	 Maintenance of adequate pressure Installation of backflow prevention assembly/device Implementation/upgrade of cross connection control program 		
Separation United States Environmental Protection Agency	46 Office of Water		

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Actions (cont.) Com on Corrective Action(s) on Cau Co Inadequate disinfectant residual Disinfection Flushing Maintaining appropriate hydraulic residence time Addition or upgrade of on-line monitoring and control Replacement/repair of distribution system components Sampler training Contaminated sampling taps Sampler training Development and implementation of an operations plan Sampling protocol errors United States Environmental Protection

Common Causes of Contamination and Corrective



Seasonal Systems A seasonal system is a NCWS, not operated as a PWS on a year-round basis, that starts up/shuts down at the beginning and end of each operating season Seasonal systems must demonstrate completion of a State-approved start-up procedure, which may include a requirement for startup sampling prior to serving water to the public. State may exempt systems from start-up requirements only if the distribution system remains pressurized during the entire period that the system is not operating (except that systems that monitor less frequently than monthly must still monitor during the vulnerable period designated by the State)

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Start-up Procedures

- All seasonal systems must demonstrate completion of a state-approved startup procedure before serving water to the public
- States have the flexibility to determine what start-up procedures are appropriate for a particular system based on site-specific considerations
- States may require one or more TC samples as part of the required start-up procedures

AD CFR 142 1664(20/04): 141 8560/40/0: 50 241.857(a)(4) Office of Water

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Seasonal Systems: Monitoring Requirements

- Must follow a state-approved start-up plan
- Must monitor monthly for all months they are in operation, unless it meets reduced monitoring criteria
- If monitoring less than monthly, the system must have a state-approved sample siting plan that designates sampling during high vulnerability periods

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Seasonal Systems - Reduced Monitoring

- Routine monthly monitoring
- Exception:
 - GW seasonal systems that serve <1000 persons may be reduced to <u>quarterly</u> or <u>annual</u> monitoring if the PWS:
 - Meets the quarterly requirements at 40 CFR 141.854(g) and for annual monitoring the additional requirements found at 141.854(h)
 - Has an approved sample sitting plan that designates the time period of monitoring based on site-specific consideration

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Routine sample	AND	Repeat sample
		EC+
		TC+
		Fails to take <u>all</u> required repeat samples
		TC+ (but not analyzed for <i>E. coli</i>)
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	Inited States rwironmental Protection gency	



Failure to conduct a Level 1 or Level 2 assessment within 30 days of learning of the trigger. Failure to correct all sanitary defects from a Level 1 or Level 2 assessment within 30 days of learning of the trigger or approved timeframe by the state. Failure of a seasonal system to complete state-approved start-up procedure prior to serving water to public.

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Monitoring (M) and Reporting (R) Violations

Monitoring violations and reporting violations tracked separately (<u>2 different</u> violation types):

- M Failure to take <u>every required routine</u> or additional routine sample in a compliance period.
- 2. M Failure to <u>analyze for *E. coli* following a TC+ routine sample.</u>
- R Failure to <u>submit a monitoring report or completed assessment</u> form after monitoring or conducting assessment correctly/timely.
 R - Failure to <u>notify the state following an *E. coli+* sample.
 </u>

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 R - Failure to <u>submit certification of completion of state-approved start-up</u> <u>procedure</u> by a seasonal system.

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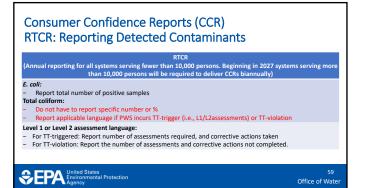
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Violation	Tier of Public Notification	
MCL	Tier 1 (issue within 24 hours)	
Treatment Technique	Tier 2 (issue within 30 days)	
Monitoring	Tier 3 (issue within one year)	
Reporting	Tier 3 (issue within one year)	
United States	40 (78 141 202, 141 203, 141 204	57

Consumer Confidence Reports (CCR)

- CCR reporting: 40 CFR 141.155(j) due July annually
- Beginning in 2027 systems serving 10,000 or more persons will be required to deliver CCRs biannually: 40 CFR 141.155(j)(2)
- Community Water Systems must report:
 - *E. coli*: total number of positive results
 - TT-triggers:
 - Number of Level 1 and Level 2 assessments triggered with special language
 Corrective actions taken
 - All violations: TT, MCL, M, R

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Special Monitoring Evaluations

- Must be conducted for all GWSs serving ≤ 1,000 with each sanitary survey
 Determines whether the following are appropriate:
 - Monitoring frequency
 - # of samples per monitoring period
- Ensures that the distribution system is evaluated in sufficient detail

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Special Monitoring Evaluation 40 CFR 141.854(c)(2) [GW, NCWSs <1000] and 141.855(c)(2) [GW, CWS <1000]

141.854(c)(2) — Beginning April 1, 2016, the State must perform a special monitoring evaluation during each sanitary survey to review the status of the system, including the distribution system, to determine whether the system is on an appropriate monitoring schedule. After the State has performed the special monitoring evaluation during each sanitary survey, the State may modify the system's monitoring schedule, as necessary, or it may allow the system to stay on its existing monitoring schedule, consistent with the provisions of this section. The State may not allow systems to begin less frequent monitoring under the special monitoring evaluation unless the system has already met the applicable criteria for less frequent monitoring in this section. For seasonal systems on quarterly or annual monitoring, this evaluation must include review of the approved sample siting plan, which must designate the time period(s) for monitoring based on site-specific considerations (e.g., during periods of highest demand or highest vulnerability to contamination). The seasonal system must collect compliance samples during these time periods.

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Special Monitoring Evaluation [141.854(c)(2) and

<u>Question</u>: Does Special Monitoring Evaluations apply to all GW CWSs and NCWSs serving 1,000 or fewer people, even those on monthly monitoring?

Response: Yes, the state must perform a special monitoring evaluation during

each sanitary survey regardless of monitoring schedule frequency for all GW

CWSs and NCWSs (including seasonal systems) serving 1,000 or fewer people.

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141.855(c)(2)]

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Requirement	Timing
. coli MCL violation, or EC+ routine sample	By end of current business day (or next
IT violation	business day if state office is closed) By end of next business day
Level 1 or 2 assessment report	Within 30 days of learning that the system has exceeded a TT trigger
Coliform monitoring violation	Within 10 days of learning of violation
Completion of corrective action, if occurring after submittal of an assessment report	When each corrective action is completed

Seasonal System Reporting Requirements

• Seasonal systems must report to the state:

Requirement	Timing
Seasonal system certification of compliance with state-	Prior to serving water to the
approved start-up procedures	public
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System Recordkeeping

Systems must maintain:

Requirement	Timing
Records of action taken by the system to correct violations	3 years
of primary drinking water regulations	5 years
Public notices issued and certifications made	3 years
Records of microbiological analysis	5 years
Copies of monitoring plans	As long as analyses are required

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System Recordkeeping (cont.)

Requirement	Timing
Level 1 or 2 assessment forms	5 years
Documentation of corrective actions	5 years
Other available summary documentation of sanitary defects and corrective actions	5 years
Records of any repeat samples taken that meet the state's criteria for an extension of the 24-hour period for collecting repeat samples.	5 years

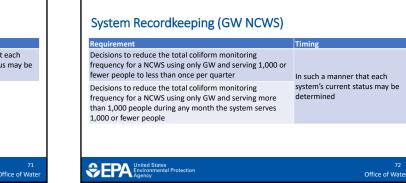
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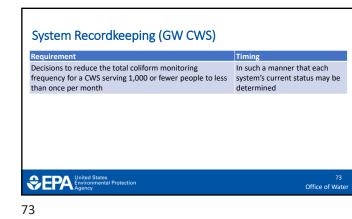
State Reporting Requirements to EPA Quarterly reports of violations and enforcement actions to SDWIS/Fed MCL violations T violations Monitoring violations Porving violations Porviolations Other violations Porviolations Annual reports of inventory and status of variances and exemptions Annual reports of inventory and status of variances and exemptions

System Recordkeeping (all systems)			
Requirement	Timing		
Microbiological analyses	1 year		
Decisions to waive the 24-hour time limit for collecting repeat samples after a TC+ routine sample or sample invalidation	5 years		
Decisions to waive the requirement for 3 routine samples the month following a TC+ sample	5 years		
Decisions to invalidate a TC+ sample	5 years		
Completed and approved Level 1 or 2 assessments	5 years		
Reports from systems of completed corrective actions	5 years		
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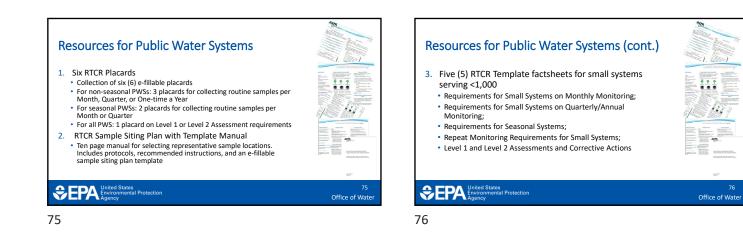
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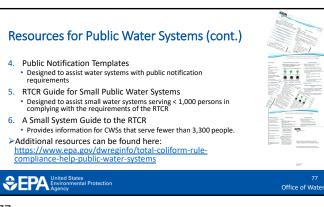


System Recordkeeping (cont.)	
Requirement	Timing
Decisions to allow a system to forgo <i>E. coli</i> testing of a TC+ sample if that system assumes that the sample is EC+	In such a manner that each system's current status may be determined
Contraction United States Environmental Protection	71 Office of Water









Resources for Primacy Agencies

- 1. RTCR Quick Reference Guide (QRG)
- 2. RTCR State Implementation Guidance
- 3. RTCR Assessments and Corrective Actions Guidance Manual
- 4. RTCR Training: 5 webinar training series (for States)
- Recordings & slides on ASDWA website <u>www.asdwa.org/rtcr</u> Target audience: Regions, States, and Technical Assistance Providers 5. RTCR workshops and presentations. Slides on ASDWA website (for States) www.asdwa.org/rtcr
 AWWA ACE in Boston, MA.

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- NRWA annual in-service training event in Mobile, AL RCAP 2014 National Training Conference in Madison, WI

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