

Seasonal Public Water Systems: A Quick Reference Guide to the Revised Total Coliform Rule

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About the Revised Total Coliform Rule (RTCR)

The RTCR is a change to the EPA's 1989 Total Coliform Rule and was enacted to provide greater public health protection. The revised rule establishes a maximum contaminant level (MCL) for *E. coli* and uses *E. coli* and total coliforms to initiate a "find and fix" approach to address potential fecal contamination of the distribution system. It requires public water systems (PWSs) to perform assessments to identify sanitary defects and take corrective action.

The RTCR contains new regulations specific to seasonal PWSs. The document summarizes the major changes and requirement for Maine's seasonal PWSs as a result of the RTCR. If you have specific questions about how the RTCR will impact your water systems please contact the Drinking Water Program



WHAT ARE SEASONAL SYSTEMS?

Seasonal systems are defined as non-community public water systems that have an annual operating period of less than 12 months (i.e. only in operation for a portion of the calendar year)

Examples of seasonal public water systems include, but are not limited to: golf courses, campgrounds, boys and girls camps, ski resorts, and some restaurants, inns, and motels.

START-UP PROCEDURES

At the beginning of each operating period, before serving water to the public, every seasonal water system must:

- ▶ Conduct a state-approved start-up procedure; and
- ▶ Certify completion of the state-approved start-up procedure.

Maine's state-approved start-up procedures for seasonal groundwater or surface water systems can be found online at:

- ▶ <https://tinyurl.com/StartupGW> (ground water systems)
- ▶ <https://tinyurl.com/StartupSW> (surface water systems)

To certify completion of the start-up procedure, water systems must complete and sign the start-up procedure template and submit it to their Public Water System Inspector before serving water to the public for the season.

Any start-up procedures for seasonal public water systems that differ from the procedures outlined in Maine's state-approved start-up plan, including those for seasonal systems using surface water, must be pre-approved by the water system's Public Water System Inspector

SAMPLING SITE PLANS

The RTCR requires that total coliform samples are collected at PWSs sites that are; 1) representative of water quality throughout the distribution system, and 2) part of a written sampling site plan subject to State review and approval. Sample site plan requirements under the RTCR include, but are not limited to: establishing sample site locations for routine total coliform samples, repeat total coliform samples, raw water samples, and follow-up total coliform samples. Sample site plans must also identify when samples will be taken during the compliance period.

Systems on quarterly TC monitoring

- ▶ Seasonal systems on quarterly (reduced) monitoring for TC must sample during a time considered to be most vulnerable to contamination. This determination must be included on the Sample Site Plan.



Keep Your Drinking Water Safe:

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✓ **Protect Your Source**

✓ **Take Your Samples**

✓ **Maintain Your Treatment**

✓ **Inspect**

SAMPLING SITE PLANS (CONT.)

All Seasonal Systems	<ul style="list-style-type: none"> ▶ Systems do not need to submit revised sample site plans for approval. ▶ DWP Public Water System Inspectors can provide review and work with PWSs to modify sample site plans that meet the guidelines set forth in the RTCR during routine sanitary surveys or on-site visits.
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ROUTINE SAMPLING

All Seasonal Systems	<ul style="list-style-type: none"> ▶ RTCR default monitoring frequency is monthly ▶ Sampling frequency may change if circumstances arise that warrant an increase in monitoring frequency to monthly such as: <i>E. Coli</i> MCL violation, Total Coliform Treatment Technique violation, or two or more Failure to Monitor violations for Total Coliform in 12 month period ▶ When sampling frequency is reviewed at a sanitary survey, PWSs must meet the following criteria in order to be approved to reduce to and/or maintain quarterly Total Coliform monitoring: <ul style="list-style-type: none"> • Approved Sample Site Plan with identified optimal time for monitoring • Clean compliance history for Total Coliform over the last 12 months • Free from sanitary defects or have an approved corrective action plan • Need to have had a sanitary survey or Level 2 Assessment within the last 12 months • Protected Source (source(s) at least 300ft away from leach fields, manure piles, agricultural spreading, etc.)
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REPEAT SAMPLING FOLLOWING A POSITIVE TOTAL COLIFORM RESULT

All Seasonal Systems	<ul style="list-style-type: none"> ▶ Within 24 hours of learning of a TC positive (+) routine sample, at least 3 repeat TC samples must be collected according to repeat sites identified in system's approved RTCR sample site plan ▶ If any repeat TC+ sample is also <i>E. coli</i> +, the <i>E. coli</i> + sample result must be reported to DWP by the end of the day that PWS is notified
Systems on Quarterly TC monitoring	<ul style="list-style-type: none"> ▶ Must take minimum of 3 additional routine samples the month following a TC+ routine or repeat sample

ASSESSMENTS AND CORRECTIVE ACTIONS

The RTCR requires PWSs that have signs of bacterial contamination (e.g. as a result of TC+ samples, *E. Coli* MCL violations, performance failure) to assess the problem and take corrective action. There are two levels of assessments (Level 1 and Level 2) based on the severity or frequency of the problem.

Triggering an Assessment	<p>Level 1 Assessments are triggered by:</p> <ul style="list-style-type: none"> • 2 or more TC+ routine/repeat samples in the same month <u>OR</u> for systems collecting 40 or more samples each month: greater than 5% of routine/repeat samples positive • Failure to take required repeat sample(s) after any single TC+ <p>Level 2 Assessments are triggered by:</p> <ul style="list-style-type: none"> • <i>E. coli</i> MCL violation • Second trigger of a Level 1 Assessment within a rolling 12 month period
Conducting an Assessment	<p>Level 1 Assessments can be performed by:</p> <ul style="list-style-type: none"> • For PWSs not required to have a licensed operator: PWS Owner or responsible party, or DWP personnel or approved entity. • For PWSs required to have a licensed operator: a licensed operator at a grade comparable to or higher than the grade of the PWS, or DWP personnel or approved entity. <p>Level 2 Assessments can be performed by:</p> <ul style="list-style-type: none"> • Must be someone other than individual who performed Level I Assessment within last 12 months at PWS • For systems not required to have a licensed operator: a licensed operator holding both a Class II Treatment <i>and</i> Class I Distribution license or higher, or DWP personnel or approved entity. • For PWSs required to have a licensed operator: a licensed operator holding a license with treatment and distribution classes equal to or higher than that of the PWS, at a minimum Class II Treatment <i>and</i> Class I Distribution, or DWP personnel or approved entity.
Corrective Actions	<p>When sanitary defects are identified during a Level 1 or Level 2 Assessment, they should be corrected as soon as possible to protect public health and must be completed within the following timeframes:</p> <ul style="list-style-type: none"> • No later than the time the assessment form is submitted to DWP, which must be within 30 days of triggering the assessment; or • Within state-approved timeframe which was proposed in the assessment form.