

REVISED TOTAL COLIFORM RULE (RTCR)

Key Takeaways of the RTCR

- The RTCR goes into effect **April 1, 2016**
- There is no more Total Coliform MCL, E. coli MCL remains
- No more Total Coliform-based Public Notice or Boil Water requirements in Vermont, E. coli-based boil and PN remains, slight changes to CCR
- Systems must take 3 repeat samples for **each** positive routine sample
 - Systems sampling monthly resume normal monthly monitoring the month following a routine positive sample
 - Systems sampling quarterly must perform 3 additional routine samples the month following a routine positive sample and keep sampling until samples are absent or increased monitoring is triggered
- The State cannot waive the requirement to perform RT or RP samples
- 2 or more total coliform samples in a month triggers a site assessment
- E. coli MCL violation requires a boil water notice and a Level 2 Site Assessment.
 - State may require a precautionary boil water notice due to site assessment or ongoing issues



Coming April 1

Submit new
bacteriological
sampling plan

Attend RTCR training

Check out DWGWP
website

Please sample
early in monitoring
period

DRINKING WATER
AND GROUNDWATER
PROTECTION DIVISION

@
www.drinkingwater.vt.gov/

@
anrweb.vt.gov/DEC/dwgwp/

REVISED TOTAL COLIFORM RULE (RTCR) GUIDE

The TCR has been successful in protecting against waterborne disease and outbreaks. However, the number of violations have remained steady. Any improvements likely to occur under the TCR have largely been achieved.

Question: How can we achieve greater public health protection?

Answer:

Increase protection of public health by reducing **sanitary defects** that allow fecal contamination and/or waterborne pathogens to enter a distribution system or could indicate a failure or imminent failure in a barrier that is already in place.

- Total Coliforms are still used as an indicator of system integrity
- However, total coliforms are not an immediate health concern on their own
- No more total coliform MCL
- Aim to FIND AND FIX

MONITORING

- All Surface Water/GWUDI Systems: **Monthly** (Same as TCR)
- Community Water Systems: **Monthly** (Same as TCR)
- Non-Community, GW, over 1,000 in population: **Monthly** (Same as TCR)
- **Seasonal**, Transient Non-Community Systems: **MONTHLY**
- Year-round Non-Community, served by Groundwater, under 1,000 in population: **Quarterly** (Same as TCR) until triggers increased [monthly] monitoring

REPEAT SAMPLING

- Every Water System must take 3 repeat samples for EACH routine TC+ sample.
 - Same sampling site as RT TC+
 - +/- 5 connections/locations upstream
 - +/- 5 connections/locations downstream
 - Groundwater Systems must take 1 triggered source water sample from each source that was active at the time of the TC +.

Systems must complete each “set” of sampling regardless of results or triggers.

ASSESSMENTS

Level 1 Site Assessment – to be performed by WS Operator

- 2 or more TC+ samples in a month
- Failure to take EVERY repeat sample following TC+ Routine sample

Level 2 Site Assessment – to be performed by State/Party approved by the State

- E. coli MCL
- Second Level 1 trigger in 12 months

SEASONAL SYSTEMS

- TNCs which do not serve water to a public population (25 or more people) year round.
- Starts-up and Shuts-down at the beginning and end of an operating season.
- Does not necessarily de-pressurize.

Requirements:

1. Monthly Routine Monitoring
2. State-Approved Seasonal Start-Up procedure and Certification PRIOR TO SERVING WATER

CONTACT INFORMATION

| | | | | |
|-------------------------------------|--------------------|-----------------------|---|-------------------|
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