



THE REVISED TOTAL COLIFORM RULE: LARGE PUBLIC WATER SYSTEMS

CHANGES TO TOTAL COLIFORM BACTERIA MONITORING REQUIREMENTS WENT INTO EFFECT APRIL 1, 2016

This fact sheet intends to explain key requirements under the Revised Total Coliform Rule (RTCR) for all community public water systems (PWSs), all surface water PWSs, and noncommunity ground water PWSs serving more than 1,000 people.

WHAT IS THE REVISED TOTAL COLIFORM RULE (RTCR)?

U.S. EPA issued a rule that changed monitoring requirements for total coliform bacteria and the way that public water systems must respond when samples show that total coliform bacteria (TC) are present. NMED DWB adopted the new requirements, which went into effect on April 1, 2016.

KEY CHANGES

- All systems were required to update their Sampling Plan by April 1, 2016.
- As of April 1, 2016, seasonal public water systems were required to complete a Start-Up Checklist and submit a Start-Up Certification form every year. The start-up procedure includes the submission of at least one start-up special purpose sample.
- Maximum Contaminant Level (MCL) for Total Coliform was eliminated.
- New MCL for E. coli now triggers a more intensive assessment (Level 2).
- TC+ samples may trigger an assessment to find and fix the cause of the positive sample.



HIGHLIGHTS FOR SYSTEMS ≥ 33,001 POPULATION

- All systems will be on a routine monthly monitoring schedule.
- Level 1 Assessment triggers are:
 - The number of TC+ samples exceeds 5.0% of the total monthly samples;
 - Failing to monitor with all required repeat samples following a TC+.
- A combination of a TC+ sample and a confirmed E. coli-positive sample in a month is an E. coli MCL violation that requires a Level 2 Assessment and public notification.

HIGHLIGHTS FOR SYSTEMS < 33,001 POPULATION

- All systems will be on a routine monthly monitoring schedule.
- Two or more TC+ samples in one month will trigger a Level 1 Assessment to find the cause of the TC+ and correct it. It is not an MCL violation but is considered a Treatment Technique trigger.
- Level 1 Assessment triggers are:
 - two or more TC+ samples during the same month;
 - Failing to monitor with all required repeat samples following a TC+.
- A combination of a TC+ sample and a confirmed E. coli-positive sample in a month is an E. coli MCL violation that requires a Level 2 Assessment and public notification.

WHAT HAPPENS IF WE HAVE A TC+ SAMPLE?

The basic response of taking repeat samples after a TC+ sample will be the same; however, there will be important changes:

- **Number** - Three (instead of four) repeat samples must be taken for each TC+ routine sample for all systems.
- **Timing** - Must be taken within 24 hours of notification, unless an extension is granted by NMED
- **Locations** - Similar as in the past, as identified in your Sample Siting Plan:
 - One at the TC+ location and
 - One within five taps upstream and
 - One within five taps downstream.
- **Multiple Routine TC+** - Every routine TC+ sample must have a set of three repeat samples collected.

IF ALL THE REPEAT SAMPLES ARE TC-, DO WE JUST GO BACK TO NORMAL ROUTINE MONITORING? YES

WHAT IS A LEVEL 1 ASSESSMENT? WHO HAS TO DO IT?

- A Level 1 Assessment is a basic examination of the entire water system, including sampling practices, to try to identify the cause of TC+ samples.
- The water system is responsible for ensuring the assessment is completed.
- Level 1 assessments may be conducted by SWA, WS3, or WS4 certified operators or any Level of operator that attends an approved NMED 8 Hour RTRC Training Session.
- Contact NMED-DWB for assistance.
- Triggering a Level 1 Assessment is not a violation! However, not completing it within 30 days IS a violation.

WHAT IS A LEVEL 2 ASSESSMENT? WHO HAS TO DO IT?

- A Level 2 Assessment is a more in-depth examination of the entire water system usually done to identify the source of E. coli in the system.
- It may also be triggered to find the cause for repeated occurrences of TC+ samples.
- Level 2 assessors must have a higher level of operator certification at either the WS3 or WS4 or any Level of operator that attends an approved NMED 8 Hour RTRC Training Session.
- Triggering a Level 2 Assessment is not a violation! However, not completing it within 30 days IS a violation.

This fact sheet is intended only to describe some key requirements under the Revised Total Coliform Rule. It is not a complete summary of the requirements. You can find further information here:

<https://www.epa.gov/dwreginfo/revised-total-coliform-rule-and-total-coliform-rule>

For more information regarding your system's requirements contact your Compliance Officer or the RTRC Rule Administrator at NMENV.RTRC@env.nm.gov.