

Comparison of Old Total Coliform Rule (TCR) vs. Revised Total Coliform Rule (RTCR)

TCR	RTCR
Sample Siting Plan	
<ul style="list-style-type: none"> Systems must collect samples that are representative of water throughout the distribution system according to a written Sample Siting Plan. Sample Siting Plans are subject to State review and revision. 	<ul style="list-style-type: none"> Systems must review and update, as necessary, a written Sample Siting Plan that identifies sampling sites & a sample collection schedule that are representative of water throughout the distribution system, <u>no later than March 31, 2016</u>. Sites may include a customer's premise, dedicated sampling station or other designated compliance sampling station. Routine, repeat & Ground Water Rule (if the system is subject to the rule) sampling sites must be reflected in the Plan. Sample Siting Plans are subject to State review and revision. <p><i>[See §141.853(a)(1)]</i></p>
Routine Monitoring Frequency	
<ul style="list-style-type: none"> Non-community ground water systems serving ≤1,000 people: 1 sample per quarter Community water systems and non-community surface water and GWUDI (subpart H) systems serving ≤1,000: 1 sample per month Systems serving >1,000 people: monthly, based on population 	<ul style="list-style-type: none"> Same as TCR <p><i>[See §141.854(b), §141.855(b), §141.856(b) and §141.857(b)]</i></p>
Repeat Monitoring	
<ul style="list-style-type: none"> Within 24 hours, systems serving ≤1,000 people must take 4 repeat samples for every TC+ routine sample; all other systems must take 3 repeat samples. Must take additional repeats for TC+ repeat samples until trigger an MCL violation and the system notifies the State, or all samples are coliform free. 	<ul style="list-style-type: none"> All systems must take 3 repeat samples for every TC+ routine sample within 24 hours, regardless of whether the system has already triggered an assessment. Must take additional repeats for TC+ repeat samples until an assessment is triggered and the system notifies the State, or all samples are coliform free. <p><i>[See §141.858(a)]</i></p>
<ul style="list-style-type: none"> For ground water systems serving ≤1,000, one required repeat upstream sample can be a source water sample used to also comply with the Ground Water Rule triggered monitoring requirement. 	<ul style="list-style-type: none"> Similar to TCR, however, the RTCR specifies that the ground water system serving ≤ 1,000 must have a <u>single well</u>. <p><i>[See §141.853(a)(5)(ii)]</i></p>
<ul style="list-style-type: none"> Repeat samples must be collected from the original TC+ site, at least one at a tap within 5 service connections upstream, & at least one at a tap within 5 service connections downstream. 	<ul style="list-style-type: none"> Systems can collect repeat samples using the same procedure as in the TCR. The system must specify in their Sample Siting Plan either fixed locations or criteria for selecting sites on a situational basis via a standard operating procedure (SOP). <p><i>[See §141.853(a)(5)]</i></p>
Additional Routine Monitoring (Temporary Routine)	
<ul style="list-style-type: none"> Systems taking < 5 routine samples per month (systems serving ≤4,100 people) must take at least 5 additional routine samples in the month following a TC+ sample 	<ul style="list-style-type: none"> Systems taking samples less frequently than once per month, must take at least 3 additional routine samples in the month following a TC+ sample. Systems that monitor monthly are no longer required to take additional routine samples the following month. <p><i>[See §141.854(j) and §141.855(f)]</i></p>

Comparison of Old Total Coliform Rule (TCR) vs. Revised Total Coliform Rule (RTCR)

Increased Monitoring Frequency	
<ul style="list-style-type: none"> Does not exist 	<ul style="list-style-type: none"> A system on <i>quarterly</i> monitoring must begin <i>monthly</i> monitoring the month after the event if: <ol style="list-style-type: none"> The system triggers a Level 2 Assessment or two Level 1 Assessments in a rolling 12-month period The system has an <i>E. coli</i> MCL violation The system has a coliform treatment technique violation The system has two RTCR monitoring violations or one RTCR monitoring violation and one Level 1 Assessment, in a rolling 12-month period <p style="color: red; text-align: right;">[See 141.854(f)]</p>
Assessments	
<ul style="list-style-type: none"> Does not exist <p>Note that under the TCR, the RTCR Level 1 Assessment triggers a) and b) at right generated a Total Coliform MCL Violation that required Tier 2 public notice. The Total Coliform MCL Violation has been replaced with the requirement to perform a Level 1 Assessment, and no public notice is required.</p>	<ul style="list-style-type: none"> Level 1 Assessment Triggers: <ol style="list-style-type: none"> For systems taking ≥ 40 samples/month: Greater than 5% of samples are TC+ For systems taking < 40 samples/month: Two or more TC+ sample results Failure to take every repeat sample after any TC+ sample within 24 hours (or within the extension approved by the State) <p style="color: red; text-align: right;">[See §141.859(a)(1)]</p>
<ul style="list-style-type: none"> Does not exist 	<ul style="list-style-type: none"> Level 2 Assessment Triggers: <ol style="list-style-type: none"> <i>E. coli</i> MCL violation (includes failure to collect all required repeats following an <i>E. coli</i>-positive routine sample within 24 hours or within a State-approved timeframe) Second Level 1 trigger within a rolling 12-month period (unless the State has determined the likely cause of the first Level 1 trigger and has established that the system has corrected the problem) <p style="color: red; text-align: right;">[See §141.859(a)(2)]</p>
Violations and Public Notification (PN)	
<ul style="list-style-type: none"> Acute MCL violation (Tier 1 PN) occurs when: <ol style="list-style-type: none"> The system has a fecal coliform or <i>E. coli</i>-positive repeat sample following a total coliform-positive routine sample The system has a total coliform-positive repeat sample following a fecal coliform or <i>E. coli</i>-positive routine sample 	<ul style="list-style-type: none"> Acute <i>E. coli</i> MCL Violations (Tier 1 PN - within 24 hours): <ol style="list-style-type: none"> The system has an <i>E. coli</i>-positive repeat sample following a total coliform-positive routine sample The system has a total coliform-positive repeat sample following an <i>E. coli</i>-positive routine sample The system fails to take all required repeat samples following an <i>E. coli</i>-positive routine sample The system fails to test for <i>E. coli</i> when any repeat sample tests positive for total coliform <p style="color: red; text-align: right;">[See 141.860(a)]</p> <p><u>Note:</u> Triggers Level 2 Assessment [See §141.859(a)(2)]</p>

Comparison of Old Total Coliform Rule (TCR) vs. Revised Total Coliform Rule (RTCR)

<ul style="list-style-type: none"> • Total Coliform MCL Violation (Tier 2 PN) occurs when: <ul style="list-style-type: none"> a) For systems taking ≥ 40 samples/month: Greater than 5% of samples are TC+ b) For systems taking < 40 samples/month: Two or more TC+ sample results 	<p>The Total Coliform MCL Violation has been replaced with the requirement to perform a Level 1 Assessment, and no PN is required.</p> <p><u>Note:</u> Triggers Level 1 Assessment</p> <p>[See §141.859(a)(1)]</p>
<ul style="list-style-type: none"> • Does not exist 	<ul style="list-style-type: none"> • Treatment Technique Violations (Tier 2 PN - within 30 days) <ul style="list-style-type: none"> a) System fails to conduct Level 1 or Level 2 Assessment within 30 days of learning of the trigger b) System fails to correct all sanitary defects from a Level 1 or Level 2 Assessment within 30 days of learning of the trigger or within a timeframe approved by the State c) Seasonal system fails to complete the State-approved start-up procedure prior to serving water to the public <p>[See §141.860(b)]</p>
<ul style="list-style-type: none"> • Monitoring/Reporting Violation (Tier 3 PN) – failure to collect required routine, repeat, and additional routine samples 	<ul style="list-style-type: none"> • Monitoring Violations (Tier 3 PN - as soon as practical, but no longer than 12 months) <ul style="list-style-type: none"> a) Failure to take every required routine or additional routine sample in a compliance period <p><u>Important Note:</u> Failure to collect any repeat sample is no longer a monitoring violation, however, it will trigger a Level 1 Assessment if the routine sample was EC-. If the routine sample was EC+, the failure to collect all repeat samples will be an <i>E. coli</i> MCL violation and trigger a Level 2 Assessment.</p> b) Failure to analyze a TC+ routine sample for <i>E. coli</i> <p>[See §141.860(c)]</p>
<ul style="list-style-type: none"> • Failure to submit a monitoring report in a timely manner (results must be submitted electronically) 	<ul style="list-style-type: none"> • Reporting Violations (Tier 3 PN - as soon as practical, but no longer than 12 months) <ul style="list-style-type: none"> a) Failure to submit a monitoring report in a timely manner (results must be submitted electronically by the laboratory performing the analysis) b) Failure to submit completed assessment form in a timely manner (within 30 days of learning of the trigger or later than the State-approved timeframe) c) Failure to notify the State by the end of the day the analysis is completed of an <i>E. coli</i>-positive sample (results must be submitted electronically) d) Failure of a seasonal system to submit a checklist and certification of State-approved start-up procedure in a timely manner <p>[See §141.860(d)]</p>