



April 2016

DOH 331-206
Revised

Fact Sheet

Revised Total Coliform Rule **Treatment technique triggers, violations, and public notification requirements**

The Revised Total Coliform Rule (RTCR) continues the basic monitoring requirements and objectives of the Total Coliform Rule; however, it offers greater public health protection by adding new requirements and updating others.

The Office of Drinking Water (ODW) always required water systems with microbial contamination to find and fix any maintenance or operational defect that could allow contamination to enter a water system. RTCR formalizes this process and requires water systems to submit a water system assessment report to us any time they have unsatisfactory sample results. It also assigns violations to water systems that fail to complete these tasks.

Treatment Technique Triggers

When a treatment trigger occurs, water systems must conduct an assessment to find and fix any sanitary defects. There are two assessment levels; both evaluate the entire system from the point of sample collection to the source of supply.

Don't wait for us to notify you about the treatment technique trigger. You must complete the assessment within 30 days after the trigger occurs, and submit an assessment report to us.

A Level 1 assessment is a basic system evaluation that an owner or other knowledgeable person can do. The RTCR requires a Level 1 assessment when one of these treatment technique triggers occurs:

- A system that collects fewer than 40 routine samples during the month has more than one coliform-present sample.
- A system that collects 40 or more routine samples during the month has coliform-present results in more than 5 percent of the routine and repeat samples.
- A water system fails to collect three repeat samples for every total coliform-present sample.

A Level 2 assessment is a more complex evaluation that only a state-qualified person can do. The RTCR requires a Level 2 assessment when one of these treatment technique triggers occurs:

- A water system has an *E. coli* MCL violation (see page 2).
- A water system incurs a second treatment technique trigger in a rolling 12-month period.

3 parts of a Level 1 or Level 2 assessment

- **Evaluation:** Identify any sanitary defect that allowed coliform to enter the distribution system or failure or imminent failure of an existing barrier.
- **Discussion:** Discuss what you identified during the assessment that might allow contamination to occur and the corrective action needed to fix it.
- **Corrective action:** Record the steps you took or will take to fix the sanitary defect that allowed the contamination to occur.



HELPING TO ENSURE SAFE AND RELIABLE DRINKING WATER

Violations

Violations under the RTCR usually indicate a failure to act. Water systems should prepare themselves to follow the rule requirements to protect the safety of their water supply.

Public Notification Requirements
Tier 1: Issued within 24 hours
Tier 2: Issued within 30 days
Tier 3: Issued within 1 year

Treatment Technique Violation

A treatment technique violation indicates the water system failed to act or respond as required. When a treatment technique violation occurs, a system must provide **Tier 2 public notification** to its customers. A coliform treatment technique violation occurs when one of the following occurs:

- A water system fails to conduct or fully complete a required Level 1 or Level 2 Assessment within 30 days of the treatment technique trigger.
- A system fails to correct any sanitary defect by taking required corrective action within the required timeframe.
- A seasonal system fails to complete an ODW-approved start-up procedure and submit a certificate of completion prior to serving water at the start of its season.

E. coli MCL Violation

If a system incurs an *E. coli* MCL violation, it must perform a **Level 2 assessment** and provide **Tier 1 public notification** to its customers. RTCR requires public notice within 24 hours after receiving confirmation of an *E. coli* MCL violation. There are four ways a system can have an *E. coli* MCL violation:

1. A total coliform-present repeat sample follows an *E. coli*-present routine sample.
2. An *E. coli*-present repeat sample follows a total coliform-present routine sample.
3. The lab fails to test a total coliform-present repeat sample for *E. coli*.
4. The system fails to take three repeat samples following an *E. coli*-present routine sample.

Monitoring Violation

A water system that incurs a monitoring violation must provide **Tier 3 public notification** to its customers. A monitoring violation occurs when:

- A system fails to collect all routine samples.
- A system fails to have each total coliform-present routine sample analyzed for *E. coli*.

Reporting Violation

A water system that incurs a reporting violation must provide **Tier 3 public notification** to its customers. A reporting violation occurs when:

- A system fails to submit a monitoring report or completed assessment form to ODW in a timely manner.
- A system fails to notify ODW of an *E. coli*-present sample in a timely manner.
- A seasonal system fails to submit to ODW a certificate of completion of an approved start-up procedure before serving water to consumers.

For more information:

Call our regional office.

Eastern Region: Spokane Valley (509) 329-2100

Northwest Region: Kent (253) 395-6750

Southwest Region: Tumwater (360) 236-3030



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