

Revised Total Coliform Rule Chapter 246-290 WAC

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Policy & Constituent Services



Mission

To protect the health of the people of Washington State by ensuring safe and reliable drinking water.



Presentation Overview

- 🔥 Rule-making status
- 🔥 Rule framework: Total Coliform Rule (TCR) vs. Revised Total Coliform Rule (RTCR)
- 🔥 New elements in RTCR
- 🔥 Our current TCR program
- 🔥 RTCR's discretionary options
- 🔥 Tentative rule-making schedule

Rule-making Status

- 🔥 EPA adopted RTCR February 13, 2013
- 🔥 State Board of Health delegated rule-making authority to us June 13, 2013
- 🔥 We filed a CR-101 to begin rule making on July 23, 2013

Rule Framework: Construct

TCR	RTCR
Confirmed TC+ is a non-acute MCL violation	Confirmed TC+ triggers a Level 1 Assessment No MCL violation for TC+
TC monthly MCL based on the number of TC+ samples/month	
Confirmed fecal coliform or <i>E. coli</i> is an acute violation	MCL violation is linked to <i>E. coli</i> Fecal coliform is not used
PN required for non-acute and acute MCL violations	PN not required when only a TC+ PN only if assessment or corrective action do not occur

Rule Framework: *E. coli* MCL

- 🔥 *E. coli* + repeat following a TC+ routine sample
- 🔥 TC+ repeat following an *E. coli* + routine sample
- 🔥 System fails to take all required repeat samples following *E. coli* +
- 🔥 System fails to test for *E. coli* when any repeat sample tests TC+

Rule Framework: Monitoring

	TCR	RTCR
Routine Monitoring	All public water systems take samples according to population	Maintains routine sampling structure of TCR
Reduced Monitoring	Small groundwater systems serving <1,000 *Note: Washington does not allow reduced monitoring currently	Systems must meet new eligibility criteria to qualify

Rule Framework: Monitoring (con't)

	TCR	RTCR
Additional Monitoring	Collect five samples the next month the month following a confirmed TC+	Collect three samples the next month the month following a confirmed TC+
Repeat Monitoring	- Systems serving 1,000 or fewer collect four repeats - Systems serving >1,000 collect three repeats	All systems collect three repeats (regardless of system type or size)

Rule Framework: Violations & PN

	TCR	RTCR
Violations and Public Notice	Tier 1 (24 hrs) - Violation of <i>E. Coli</i> / FC MCL (acute MCL violation)	Confirmed <i>E. coli</i> + or failure to take repeat samples after <i>E. coli</i> + both trigger PN, a Level 2 assessment and corrective action
	Tier 2 (30 days) - Violation of monthly TC MCL	Non-acute TC MCL violation is dropped. Tier 2 PN required for a treatment technique violation (for failure to conduct assessment or corrective action)
	Tier 3 (1 year) - Monitoring & Reporting Violations	Separate tracking of monitoring and reporting violations

New Elements: Assessments

- ◆ **Assessments**
 - Level 1 – For systems that may be vulnerable to contamination (confirmed TC+) or failed to take all repeats after a TC+
 - Level 2 – For systems with an *E. coli* MCL violation, a monitoring violation or too many Level 1 assessment triggers

New Elements: Corrective Action

- ◆ **Corrective action**
 - Systems must correct all sanitary defects found in assessment
 - State must approve if no sanitary defects found in self-assessment

Other New Elements in RTCR

- ◆ **Specific requirements for seasonal systems**
- ◆ **Violations & Public Notification**
 - *E. coli* MCL violation or failure to take repeat samples – 24 hour notice
 - Failure to conduct an assessment or complete corrective action – 30 day notice

Our TCR Program

- ◆ **Currently our rule is more stringent than the federal rule**
 - We don't have provisions to allow reduced monitoring
- ◆ **Affects how we address discretionary options in RTCR**

RTCR – Discretionary Options

- ◆ **EPA provides flexibility (but cannot be less stringent than federal rule)**
 - Monitoring requirements
 - Analytical methods
- ◆ **We will discuss these in detail at the October DWAG meeting**

Tentative Rule-making Schedule

Task	Date
Begin rule making	July 2013
Discuss RTCR with DWAG	August & October 2013
Informal review of draft rule	Spring 2014
Public hearing - proposed rule	Fall 2014
Rule adopted/effective date	March/April 2015
Implementation date	April 1, 2016

Questions & Comments

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