



Fact Sheet

Transition from Stage 1 to Stage 2 Disinfection Byproducts Rule Monitoring

The Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 Rule) sets new monitoring requirements for total trihalomethanes (TTHM) and haloacetic acids (HAA5). The U.S. Environmental Protection Agency (EPA) published the Stage 2 Rule in January 2006, and Washington State assumed responsibility for the Stage 2 Rule on January 4, 2010. The Stage 2 Rule applies to all community and nontransient noncommunity (NTNC) Group A water systems that deliver water continuously treated with a primary or residual disinfectant other than ultraviolet light. The Stage 2 Rule does not apply to water systems that only use these disinfectant chemicals temporarily, such as after facility cleaning or repair.

Frequently Asked Questions

How do I know which Stage 2 Rule due dates apply to my system?

Water system size (population served) determines which “Schedule” water systems must follow to comply with Stage 2 Rule requirements. If your water system has a non-emergency intertie with another water system, the population that determines your “Schedule” is based on the population of the largest water system in your combined distribution system.

Schedule for Stage 2 Rule Implementation Dates

Schedule Number	Public water system population ¹	Submit IDSE document ² or receive a 40/30 Certification or Very Small System Waiver	Complete IDSE monitoring or study	Submit IDSE Report	Begin routine monitoring according to Stage 2 Rule
					Due Dates
1	≥ 100,000	October 1, 2006	September 30, 2008	January 1, 2009	April 1, 2012
2	50K – 99,999	April 1, 2007	March 31, 2009	July 1, 2009	October 1, 2012
3	10K – 49,999	October 1, 2007	September 30, 2009	January 1, 2010	October 1, 2013
4	< 10,000	April 1, 2008	March 31, 2010	July 1, 2010	October 1, 2013 ³ October 1, 2014 ⁴

- Public water systems that have non-emergency interties with other water systems must comply with the deadlines for the largest water system in their combined distribution system.
- An Initial Distribution System Evaluation (IDSE) document is a standard monitoring plan or system-specific study plan. NTNC water systems serving < 10,000 people are exempt.
- Ground water systems and surface water systems that did not have to do *Cryptosporidium* monitoring under the Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR).
- Surface water systems that also did *Cryptosporidium* monitoring under LT2ESWTR.

What are the differences between Stage 1 and Stage 2?

The Stage 2 Rule has three major changes to the Stage 1 Rule: 1) water systems choose Stage 2 monitoring locations based on monitoring data (either historical Stage 1 data or data collected through the IDSE); 2) Stage 2 bases compliance on locational running annual average (LRAA) calculations at each individual monitoring location; and 3) the Stage 2 Rule now includes Consecutive Systems that do not provide their own treatment, but receive treated water from a supplying water system.



Which monitoring do I need to do – Stage 1 or Stage 2 – and when?

Water systems currently required to sample under the Stage 1 Rule must continue routine monitoring for TTHM and HAA5 under the Stage 1 Rule until the date for routine monitoring under the Stage 2 Rule begins. The Stage 2 Rule monitoring requirements will replace the Stage 1 Rule requirements and take effect as noted in the table above. Before beginning the Stage 2 compliance monitoring you should complete a compliance monitoring plan.

What changes are there for my bromate, chlorite, and disinfectant residual monitoring?

Monitoring for bromate, chlorite, and disinfectant residuals under the Stage 2 Rule will continue as required by the Stage 1 Rule. Water systems using ozone may qualify for reduced bromate monitoring if they use a laboratory certified to analyze bromate using one of the new EPA-approved methods.

How do I determine my Stage 2 Rule monitoring locations?

Stage 2 uses the data collected for both Stage 1 and the IDSE for choosing the best TTHM and HAA5 monitoring locations. The Stage 2 Rule gave very specific instructions for choosing the locations so it is important to follow the available guidance. You will use the selected monitoring locations for Stage 2 Rule compliance monitoring according to the schedule in the table above.

I completed the IDSE. What do I do next?

If you did not submit your IDSE directly to EPA, you must submit an IDSE Report to our regional office according to the schedule in the above table. The IDSE report may also be used as your monitoring plan for the Stage 2 compliance monitoring. If you intend to use the IDSE Report as your Stage 2 monitoring plan, it must include compliance calculation procedures for TTHM and HAA5 MCLs and disinfectant residual MRDLs. As of January 4, 2010, we will review and approve IDSE reports.

I received a VSSW, a 40/30 Certification, or my system is a NTNC – What do I do next?

There are three cases in which water systems are not required to conduct an IDSE: 1) the water system received a VSSW (Very Small System Waiver), 2) the water system received a “40/30 Certification”, or 3) the water system is an NTNC water system serving less than 10,000 customers. If you fit in one of these cases, you must use historic Stage 1 Rule monitoring results to select your routine Stage 2 Rule monitoring locations. Select sites and sampling times based on the locations and times of year when the TTHM and HAA5 results were highest. Then prepare a compliance monitoring plan using these selected locations. For guidance on preparing the plan, contact our regional office or refer to the guidance at the EPA website. **The Stage 2 compliance monitoring plan must be completed by the date routine Stage 2 monitoring begins.** Meeting this deadline will ensure you are ready to start the Stage 2 compliance monitoring in 2012, 2013, or 2014, whichever applies to your water system.

For more information

You can find templates and guidance for completing the IDSE report and compliance monitoring plan at the following websites, or you can contact your regional office for help:

<http://yosemite.epa.gov/R10/WATER.NSF/drinking+water/IDSEreports>

<http://www.epa.gov/safewater/disinfection/stage2/compliance.html#pws>

Detailed compliance instructions are in *Complying with the Stage 2 Disinfectants and Disinfection Byproducts Rule: Small Entity Compliance Guide*.

Call the Office of Drinking Water at (800) 521-0323 or the:

- Southwest Region, Tumwater (360) 236-3030
- Northwest Region, Kent (253) 395-6750
- Eastern Region, Spokane Valley (509) 329-2100