



# Preparing a Coliform Monitoring Plan

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## Exceptions to Triggered Source Monitoring for Wholesale or Consecutive Systems

All Group A public water systems must collect samples for coliform bacteria analysis (WAC 246-290-310). The rules require you to collect routine coliform samples from the distribution system. In addition, if a routine distribution system sample is coliform-present, the Groundwater Rule (GWR) requires you to determine whether *E. coli* is in the groundwater by sampling all groundwater sources that were in use when you collected the coliform-present distribution system sample. This “triggered monitoring” must occur within 24 hours after you receive notification of the coliform-present sample.

**Any Group A public water system that buys or sells groundwater must conduct triggered monitoring of all groundwater sources whenever a routine distribution system sample is coliform-present for its own or any consecutive water system (WAC 246-290-320).**

Include this monitoring in your Coliform Monitoring Plan (CMP). As part of the plan, you may take advantage of exceptions to triggered monitoring discussed below. If you need help preparing your CMP, see Resources on the next page.

**The GWR permits exceptions to triggered monitoring in three circumstances.**

1. The wholesaler is conducting compliance monitoring after installing treatment to provide at least 4-log virus treatment.
2. The wholesale or consecutive system has an approved Reduced Triggered Source Monitoring Plan that shows water from a groundwater source cannot reach the coliform-present sample location.
3. The wholesaler may be excused from Triggered Source Monitoring if we determine in writing that a deficiency in the consecutive system caused the total coliform-present sample.

## Coliform Monitoring Plan Coordination

To take advantage of the third exception, a wholesaler must demonstrate that they collected a sufficient number of coliform-absent samples at roughly the same time the consecutive system took the coliform-present sample to demonstrate that they did not have a coliform problem. The only way to accomplish this is for the wholesale and consecutive system staff to coordinate the sampling schedules in their CMPs.

If you are a wholesaler and you want to coordinate your routine coliform sample collection program with any of your consecutive systems, you should consider the following.

- CMPs for wholesale systems must include a convincing description of a coordinated coliform monitoring program between wholesale and consecutive systems.

- The wholesale system's CMP must identify the "number of routine samples" it needs to take to demonstrate that its distribution system and sources are not the source of the coliform-present sample(s) in the consecutive system.
- The wholesale system's CMP must demonstrate that every time a consecutive system collects routine coliform samples, the wholesale system is collecting enough samples of its own to conclude that the wholesale system is not the source of the consecutive system's coliform-present sample(s). Both systems should collect their routine coliform samples on the same day; however, the wholesaler may take its samples one or two days prior.
- The GWR anticipates that all systems with groundwater sources will perform triggered source monitoring even if they disinfect. Providing disinfection treatment is not justification for an exception to triggered monitoring unless the system also performs compliance monitoring.

Communication between the wholesale and consecutive systems is the key to success. They must coordinate their CMPs if a wholesaler wants to demonstrate that triggered source monitoring is not required because of a distribution problem in a consecutive system.

## Resources

[Groundwater Rule 331-447 \(PDF\)](#)

[Preparing a Coliform Monitoring Plan: For Large or Multiple-Source Systems 331-036 \(PDF\)](#)

[Preparing a Coliform Monitoring Plan: For Systems With One Supply Source 331-240 \(PDF\)](#)

## For More Information

Find more resources on our [Publications and Forms webpage](#).

Contact our nearest regional office from 8 AM to 5 PM, Monday through Friday.

[Eastern Region](#), Spokane Valley 509-329-2100.

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