



Revised Total Coliform Rule

By Simon McCormack, Minnesota Department of Health engineer

In 2013, a revision to the Total Coliform Rule, the Revised Total Coliform Rule (RTCR), was finalized. The rule will go into effect on April 1, 2016. **Public water systems (PWS) need to be made aware of this new rule as it brings new requirements.** These new requirements bring changes to maximum contaminant level (MCL) violations, changes to reduced monitoring, and require PWSs to “find and fix” causes of contamination by performing assessments of the water system.

With the current rule, PWSs incur a violation for exceeding the maximum contaminant level (MCL) for total coliform or E. coli. A total coliform MCL violation requires public notification within 30 days and an E. coli (acute) MCL violation requires public notification within 24 hours. The RTCR eliminates the total coliform MCL violation and thus the required public notification, but instead requires a Level 1 assessment. Acute MCL violations are continued with the RTCR, but, in addition to the public notification, a Level 2 assessment is required. Also, any missing repeat sample will now trigger a Level 1 assessment or a Level 2 assessment and acute MCL violation.



Monitoring schedules for all PWSs will be the same with the RTCR, but stricter requirements will be placed on those systems on reduced monitoring (those that sample once per quarter). Reduced systems will have to sample once per month for at least 12 months if it incurs any of the following in a rolling 12-month period: two Level 1 assessments, a single Level 2 assessment, a treatment technique violation (failing to conduct required assessments or corrective actions), two monitoring violations, or if they no longer have a state-certified operator. After at least a year, a system may go back to reduced monitoring if it meets certain requirements.

Level 1 and Level 2 assessments are essentially an investigation to discover and correct the cause of contamination and differ in scope of the investigation of the water system. While a Level 1 assessment can be narrowed down to a review of certain elements, a Level 2 assessment requires a review of all five of the elements of a water system as well as a physical inspection where appropriate. The five elements include events that may have impaired water quality, changes in the distribution system operating and maintenance, source and treatment considerations, existing water quality monitoring data, and inadequacies in sample sites, sampling protocol, and sample processing. Level 1 assessments will be performed by a district engineer for systems 1,000 and less in population and by the PWS for systems greater than 1,000 in population. Level 2 assessments will be performed by a district engineer for all populations. MDH will provide an assessment form, which must be completed and submitted to the state for review within 30 days.

Any sanitary defects found during the assessment must also be corrected within 30 days. A sanitary defect is defined as, “a defect that could provide a pathway of entry for microbial contamination into the distribution system or that is indicative of a failure or imminent failure of a barrier that is already in place.” District engineers may contact you to develop a sample site plan for your routine samples under the RTCR. The purpose of the RTCR is to improve public health protection by reducing the pathways through which pathogens can enter the distribution system by enacting this “find and fix” approach. PWSs need to be aware and be ready for the RTCR to ensure a smooth transition to the new rule. If you have any questions, contact me, Simon McCormack, at 651-201-5180 or at simon.mccormack@state.mn.us.

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