

RTCR Rule Package

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BER Meeting

21 April 2016

Outline of Talk

- Projected Timeline for Rule Proposal and Adoption
- Scope of Rule Package
- Bird's Eye View of Rule Package
- Questions

Outline of Talk

➤ Projected Timeline for Rule Proposal and Adoption

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Projected Timeline

Feb 2013	RTCR Adopted (78 FR 10269)
Feb 2013 on	Outreach / PWS Focus Group Input
Feb 2015	MT Requests / Receives Extension
March 2016	EPA, Postcards
April	RTCR Implemented (EPA)
June?	Propose Rules
Sept?	Adopt Rules
Feb 2017	Primary Extension Deadline

Outline of Talk

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- Scope of Rule Package
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Scope of Rule Package

- ✓ RTCR
- ✓ 2015 Edition of the CFR
- ✓ Housekeeping and Clarifications

Outline of Talk



➤ Bird's Eye View of Rule Package



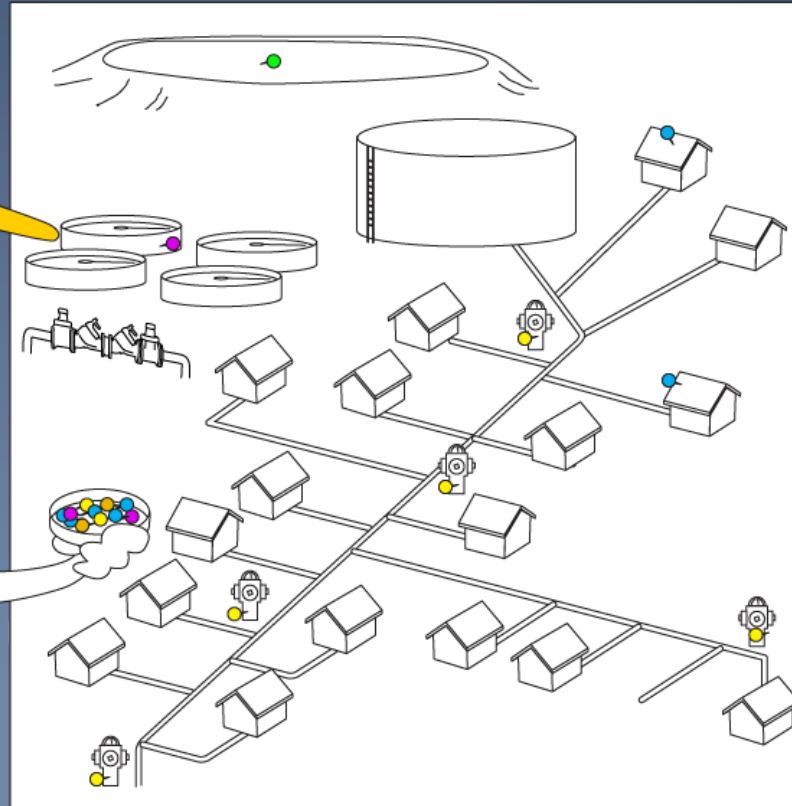
RTCR Overview

- ❖ TCR of 1989
- ❖ EPA is required to review and revise each national primary drinking water regulation every 6 years
- ❖ SDWA requires any revision to “maintain, or provide for greater, protection of the health of persons”
- ❖ Applies to all public water systems

RTCR-Major Changes

1. Site Sampling Plans
2. Testing for *E. coli*
3. Seasonal Systems
4. Coliform Monitoring Frequency
5. Clean Compliance History
6. Dual Sampling
7. Temporary Routines
8. Level 1 and 2 Assessments

1. Site Sampling Plans

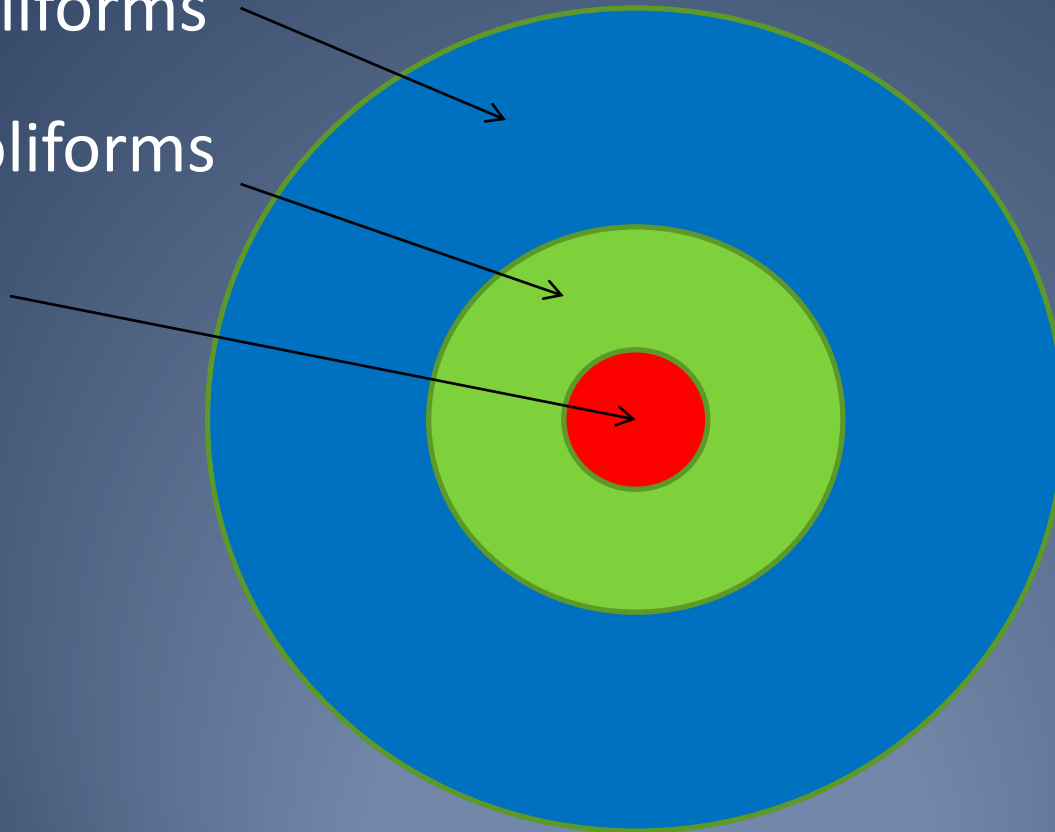


2. Testing for *E. coli*

Total Coliforms

Fecal Coliforms

E. coli



3. Seasonal Systems

Perform and Document Start-up Procedure

Flushing stagnant water from pipes

Inspecting equipment

Checking chemicals

Testing a sample of water for coliforms
(state discretion)



4a. Coliform Monitoring Frequency

System Type	Routine	Montana
All PWS > 1,000	1+/month	Yes
Surface Water, GWUDI of Surface Water, or Blended Surface Water/GWUDI ≤ 1,000	1/month	Yes
GW CWS ≤ 1,000	1/month	Yes
GW NCWS ≤ 1,000	1/quarter	No ★
Seasonal NCWS ≤ 1,000	1/month	Yes

★ MAR notice 17-089, published in 1999



4b. Reduced Coliform Monitoring Frequency

System Type	Reduced	Montana
GW CWS \leq 1,000	1/quarter	No
GW NCWS \leq 1,000	1/year	No; non-seasonal 1/quarter
Seasonal NCWS \leq 1,000	1/quarter or 1/year	No



DISCRETION

4c. Montana Monitoring Pre- and Post- RTCR

System Type	Through March 2016	Beginning April 2016
All Systems	Monitor monthly.	Monitor monthly.
Seasonal TNC Systems, Using only GW and Serving 1,000 or Fewer People	Can qualify for quarterly monitoring by meeting specific requirements.	No longer qualify for quarterly monitoring.
Non-Seasonal TNC Systems, Using only GW and Serving 1,000 or Fewer People	Can qualify for quarterly monitoring by meeting specific requirements.	Can qualify for quarterly monitoring by meeting specific requirements.



5. Clean Compliance History

Federal Definition: a record of no MCL violations under §141.63; no monitoring violations under §141.21 or subpart Y; and no coliform treatment technique trigger exceedances or treatment technique violations under subpart Y.

State Policy: A system must have satisfactory total coliform test results for 24 months and no MCL exceedances, monitoring violations, or TT violations of any kind for 12 months.



6a. Dual Sampling

- Montana, through April 2016, allowed the use of dual samples. GW systems serving 1,000 or fewer people qualified.
- Example:
 - A routine sample comes back positive
 - With dual sampling, this triggers the collection of 3 repeat samples and 1 dual sample. (4 samples)

6b. Dual Sampling

- Montana proposes to NOT adopt dual sampling. Only systems with a single GW well serving $\leq 1,000$ would be eligible.
- Example:
 - A routine sample comes back positive
 - Without dual sampling, this triggers the collection of 3 repeat samples. (3 samples)



7. Temporary Routines

- Before April 2016:
Small systems: 5 temporary routines are required the month following a positive routine followed by a positive repeat
- Current (with RTCR):
Small systems: a level 1 or 2 assessment is triggered following a positive routine followed by a positive repeat



8a. Level 1 Assessments

- Triggered by:
 1. Small systems: 2 or more TC+ routine/repeat samples in the same month. Large systems: greater than 5% of routine/repeat samples are positive.
 2. Failure to take all required repeat samples after any single TC+ result.



8b. Level 2 Assessments

- Triggered by:
 1. E. coli MCL violation
 2. A second triggered level 1 assessment within a rolling 12 month period
- Completed by DEQ personnel



Questions?



Information to Include in
Rule Package Proposal?