RTCR Rule Package

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BER Meeting

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Outline of Talk

➢ Details of the Rule Package

      - ARM by ARM

      - 1989 TCR versus RTCR

➢ The RTCR was implemented under EPA authority in April 2016

➢ Questions?

17.38.104 (*non RTCR)

✓ ..."significant deficiency" means any defect in design, operation, or maintenance of a public water supply system or public sewage system, or a failure or malfunction of the system, that the department determines causes, or has the potential to cause, the introduction of <u>fecal, chemical, or other</u> contamination into a drinking water supply... The term also includes <u>factors and conditions that hinder the determination of the source or potential source of contamination, such as improper sample locations or sample taps.</u>

17.38.202

✓ not adopting the term "clean compliance history". The Federal definition conflicts with ARM 17.38.215 that implies the use of the term.

✓ Federal rule: Q → M → Q

✓ Montana rule: M → Q → M → Q

<u>State Policy: apply for quarterly monitoring</u>

➢ 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.

➢ Systems on Q at the end of March 2016 stayed on Q unless they trigger under other conditions.

<u>State Rule: to re-apply for quarterly monitoring</u>

➢ 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.

17.38.211

Dual Sampling

✓ 1989 TCR: allowed the use of dual samples. GW systems serving 1,000 or fewer people qualified.

✓ RTCR: Montana proposes to NOT adopt dual sampling. Only systems with a <u>single GW</u> well serving ≤ 1,000 would be eligible.

However, the requirement will still be to collect 4 samples after a total coliform positive.

17.38.215

➢ Seasonal systems

➢ Coliform monitoring frequency

➢ What happens after a confirmed coliform positive

Seasonal Systems

✓ 1989 TCR – no requirements

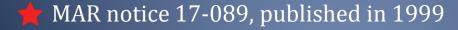✓ RTCR - Perform and Document Start-up Procedure

Flushing stagnant water from pipes

Inspecting equipment

Checking chemicals

Testing a sample of water for coliforms (state discretion)

DISCRETION

MANDATORY

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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

MANDATORY

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Reduced Coliform Monitoring Frequency

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

DISCRETION

Montana Monitoring Pre- and Post- RTCR

System Type	1989 TCR	RTCR
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. Note: those on Q stay on Q unless triggered under other conditions.

What Happens After a Coliform Positive

✓ 1989 TCR

    Small systems: 5 temporary routines are required the month following a positive routine

✓ RTCR

    Small systems: a level 1 or 2 assessment is triggered when the system has 2 or more positive samples in a compliance period

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.

MANDATORY

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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