

Level 2 Assessment

- ◆ A Level 2 Assessment is more thorough examination of the source water, treatment, distribution system, operations and sampling location.
- ◆ Level 2 Assessments will be conducted by the state.

Level 2 Triggers:

- ◆ A PWS incurs an *E. coli* MCL violation.
- ◆ A PWS has a second level 1 Assessment within a rolling 12 month period.

E. coli MCL Violation

<i>E. coli</i> MCL Violation Occurs with the Following Sample Result Combination	
If your routine is:	And if your repeat is:
EC+	TC+
EC+	Any missing sample
EC+	EC+
TC+	EC+
TC+	TC+ (but no <i>E. coli</i> analysis)

A PWS will receive a Treatment Technique violation when any of the following occur:

- ◆ Failure to conduct a Level 1 or 2 Assessment within 30 days of notification.
- ◆ Failure to correct all sanitary defects from a Level 1 or 2 Assessment within 30 days of a notification or in accordance with a state-approved timeframe.
- ◆ Failure of a seasonal system to complete state-approved start-up procedures prior to serving water to the public.

Helpful hints:

- ◆ Find and correct sanitary defects as soon as you become aware of them.
- ◆ Make sure to collect all routine and repeat samples as required.
- ◆ Timely and correct monitoring can help reduce triggering a Level 1 or 2 Assessment.
- ◆ If you are a seasonal system make sure you follow the start-up procedure and turn in the completed form before serving water to the public.
- ◆ Consult with Montana DEQ if you have any questions. We are here to help!



Montana's Quick Reference Guide for the Revised Total Coliform Rule

Overview of the Rule

Title: Revised Total Coliform Rule (RTCR) 78 FR 10269, February 13, 2013, Vol. 78, No. 30

Purpose: Increase public health protection through the reduction of potential pathways of entry for bacterial contamination into distribution systems.

General Description: The RTCR establishes a Maximum Contaminant Level (MCL) for *E. coli* and uses *E. coli* and total coliforms to initiate a "find and fix" approach to address contamination that could enter into the public water supply. It requires public water systems (PWSs) to perform assessments to identify sanitary defects and subsequently take action to correct them.

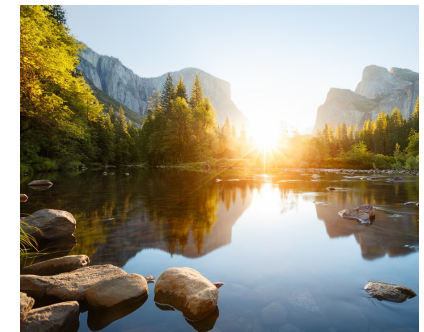
******Beginning April 1, 2016: PWSs must comply with the RTCR requirements.******

Utilities Covered: All Public Water Systems

Deadlines and Requirements

Before April 1, 2016:

PWSs must develop a written sample siting plan that identifies the system's sample collection schedule and all sample sites (routine and repeat).



For additional information on the RTCR: Call the Safe Drinking Water Hotline at 1-800-426-4791; visit the EPA website at: http://water.epa.gov/lawsregs/rulesregs/sdwa/tcr/regulation_revision.cfm

Or contact Montana DEQ Public Water and Subdivision Bureau (contact info can be found on the back of this brochure).

Montana Department of Environmental Quality
Public Water Supply Section
Public Water and Subdivision Bureau
1520 E. 6th Ave
Helena, MT 59620
P.O. Box 200901
Helena, MT 59620-0901
(406) 444-4400

Emphasis is on “find and fix”

Basic Changes

Acute violation based on having at least one *E. coli* positive sample. Non acute violations based solely on total coliform no longer exist. Emphasis is on conducting system assessments (Level 1 and Level 2).

Routine Monitoring Requirements

Number of monthly samples based on population; same as under the Total Coliform Rule (TCR).

Reduced Monitoring

Only year round Transient Non Community systems will be eligible for quarterly monitoring. Systems on reduced monitoring will have triggers for increased monitoring (same as under the TCR).

Repeat Monitoring

All systems are required to take **3 repeat distribution samples** following a routine total coliform positive (TC+) or *E. coli* positive (EC+) sample.

Dual Purpose Samples

Dual purpose samples to satisfy both the RTCR and the Groundwater Rule will **not** be allowed. **Each system must sample all their active wells in addition to taking 3 repeat samples from their distribution system.**

Additional Routine Monitoring

(temporary routine) For PWSs taking 1 TC sample per month (majority of MT PWSs) the **additional 5 routine samples required the following month is eliminated (take usual number of samples the following month).**

Seasonal Systems

Seasonal Systems are required to demonstrate a state-approved start up procedure and certify the start-up procedure has been followed every year starting in 2016.

Failure to complete start-up procedure is a Tier 2 Treatment Technique violation.



Level 1 and Level 2 Assessments

Assessments and Corrective Action

The RTCR requires PWSs that have an indication of coliform contamination (i.e. TC+ samples, *E. coli* MCL violations, or failure to take repeat samples) to assess the problem and take corrective action. There are two levels of assessments (Level 1 and Level 2) based on the severity and/or frequency of the problem.

Purpose of Level 1 and Level 2 Assessments

To identify and fix defects at the PWS that could provide a pathway of entry for microbial contamination, or that indicate failure (existing or potential) of protective barriers against microbial contamination.

Timelines for Completing Corrective Actions

When sanitary defects are identified during a Level 1 or 2 Assessment, they should be corrected as soon as possible. The Assessment Form must be submitted to the state within **30 days** of notification regardless if all corrective actions have been completed. **Failure to return the Assessment Form within 30 days is a violation.** If corrections or repairs are not completed within the first 30 days after notification, then a state-approved timeframe with corrective actions may be granted after the PWS consults with the state.

Level 1 Assessments

Level 1 assessment is a basic examination of the source water, treatment, distribution system, and operations.

Conducting Level 1 Assessments

- ◆ Performed by the PWS or a certified professional of the PWS's choice.
- ◆ Level 1 Assessment Form is due to the state 30 days after notification.

Level 1 Assessment is triggered if any one of the following occurs:

- ◆ A PWS collecting fewer than 40 samples per month has 2 or more TC+ routine/ repeat samples in the same month.
- ◆ A PWS collecting 40 samples or more per month, the system has 5.0 percent of the routine/repeat samples in the same month that are TC+.
- ◆ A PWS fails to take every required repeat sample after any single TC+ sample.

Don't forget to sample early in the month in case you have to re-sample.

