

Overview of the Revised Total Coliform Rule (RTCR)

When sampling results show that your PWS may be vulnerable to contamination, PWSs must perform a Level 1 or Level 2 assessment to find and fix any sanitary defects. A sanitary defect can provide a pathway of entry for microbial contamination into the distribution system or indicate imminent failure in an existing barrier (e.g. cracked tank, rat droppings on wellheads, or broken seals)

A Level 1 assessment is a basic examination of the system. The Level 2 assessment is a more comprehensive and in-depth examination of the system compared to a Level 1 assessment. There are 5 basic elements to investigate during a Level 1 or Level 2 Assessment:

- Atypical events that may affect distributed water quality or indicate that distributed water quality was impaired;
- Changes in distribution system maintenance and operation, including water storage;
- Water source and treatment methods that affect distributed water quality;
- Inadequacies in sample sites, sampling protocol and sample;
- Existing water quality monitoring data

Seasonal Public Water Systems

A Seasonal Public Water System is a non-community water system that is not operated as a public water system (PWS) on a year-round basis and starts-up and shuts-down at the beginning and end of each operating season. Examples include: campgrounds, fairgrounds, seasonal food service facilities, and ski areas open during part of the year.

Beginning on April 1, 2016, owners/operators of Seasonal Public Water Systems must perform a Seasonal Start-Up Procedure to be in compliance with the Federal Safe Drinking Water Act. The procedure, which includes flushing, disinfection, and sampling of the system, must be performed prior to opening for their season. The start-up procedure will also require the system to collect one or more 'special' microbiological samples to verify water quality.

Small System Compliance

According to the Revised Total Coliform Rule, a small public water system is defined as any public water system that collects fewer than 40 compliance samples per month and serves a population less than 1,000.

Level 1 Assessment Trigger

A Level 1 assessment is required (triggered) when either of the following conditions occurs:

- Two or more of all samples are total coliform-positive in the same sampling period (includes the results of all routine and repeat samples)
- Not all required repeat samples are collected after a routine total coliform-positive sample

Level 2 Assessment Trigger

A Level 2 assessment is required (triggered) when any of the following conditions occurs:

- An E. coli MCL violation
- An E. coli monitoring violation

- Two (2) Level 1 assessments are triggered within a rolling 12-month period

Large System Compliance

According to the Revised Total Coliform Rule, a large public water system is defined as any public water system that collects more than 40 compliance samples per month and serves a population greater than 1,000.

Level 1 Assessment Trigger

A Level 1 assessment is required (triggered) when either of the following conditions occurs:

- More than 5.0% of all samples are total coliform-positive in the same sampling period (includes the results of all routine and repeat samples).
- Not all required repeat samples are collected after a routine total coliform-positive sample

Level 2 Assessment Trigger

A Level 2 assessment is required (triggered) when any of the following conditions occurs:

- An E. coli MCL violation
- An E. coli monitoring violation
- Two (2) Level 1 assessments are triggered within a rolling 12-month period

Timeline for Completing a Level 1 or Level 2 Assessment

A system must complete a Level 1 or Level 2 assessment, correct any sanitary defects found and submit the assessment form to NMED-DWB within 30 days after learning that it has triggered the assessment. If there are corrective actions not completed at the time of the submission of the form, the system must also include a timetable for completing the rest of the corrective actions and report to NMED-DWB when each outstanding corrective action has been completed.

Public Notification

The water system will be required to notify the public any time maximum contaminant levels are exceeded. These violations of the standards fall into one of three Tiers.

A Tier 1 notice is required for a violation that has a significant potential for immediate adverse health effect. Tier 1 violations require 24-hour public notice and must be reported to NMED within 24 hours of violation notification.

A Tier 2 notice is required for a violation that has potential for a serious, not immediate, adverse health effect and requires public notice within 30 days.

A Tier 3 notice is required for violations not included in Tiers 1 or 2 and requires public notice within 12 months. Tier 2 and 3 violations must be reported to NMED within 10 days of notification.

Systems must also submit a written certification of notification to NMED – DWB within 10 days for all tiers. A copy of the notice that was distributed to the public must also be included.

TIER 1: E. COLI MCL VIOLATION

When any of the following conditions are present, a Tier 1 Violation occurs:

1. The system has an E. coli positive repeat sample following a Total Coliform positive routine sample.
2. The system has a total coliform positive repeat sample following an E. coli positive routine sample.
3. The system fails to take all required repeat samples following an E. coli positive routine sample.

TIER 2: ASSESSMENT AND CORRECTIVE ACTION

Under the Revised Total Coliform Rule, the monthly Total coliform MCL violation no longer exists. Instead, this violation triggers an Assessment and Corrective Action. When any of the following conditions are present, a Tier 2 Violation occurs:

1. A public water system fails to conduct required assessment or corrective action within 30 days of a triggered notification.
2. A seasonal system fails to complete a state-approved start-up procedure prior to serving water to the public.

TIER 3: MONITORING VIOLATION

All Tier 3 violations will track each individual monitoring and reporting violation separately. All public water supply systems must notify NMED for any E.coli positive sample result.

When any of the following conditions are present, a Tier 3 Violation occurs:

1. Failure to take all required routine samples.
2. Failure to report all sample results within the required timeframes.