Subject:	Coliform – Increase to monthly and steps to return to quarterly monitoring	Original Date:	8/8/18
Unit + initials:	TS – ks/cl/aw/bp/cm/mb	Revised date:	5/17/19
Purpose & Scope: This procedure describes how non-community systems would			
increase to monthly monitoring, have opportunity to stay on quarterly monitoring,			
and steps to go from monthly back to quarterly monitoring.			

Procedure/Process:

A non-community system (NTNC or TNC) may increase from quarterly to monthly monitoring as outlined in OAR 333-061-0036(6)(b)(C) if the water system:

- Exceeds the MCL for *E. coli*;
- Triggers a level 2 coliform investigation or two level 1 coliform investigations within a rolling 12-month period;
- Does not complete a level 1 or level 2 coliform investigation by due date;
- Does not complete corrective action by the approved due date following an investigation;
- Incurs two M&R violations for failing to collect every routine coliform sample in a rolling 12-month period; or
- Incurs at least one M&R violation (excluding source sample violations) in combination with triggering a coliform investigation in a 12-month period.

Opportunity to stay on quarterly monitoring or increase to monthly monitoring:

 In OAR 333-061-0036(6)(b)(A), a TNC system that incurs two violations for failing to monitor coliform quarterly in a rolling 12-month period is given the opportunity to continue quarterly monitoring by collecting both a makeup and a routine sample in the next quarter as described in subsection (6)(b)(C)(iv). [NTNC systems are currently given the opportunity to stay on quarterly monitoring if 0036(6)(b)(A) is met.]

Note that the water supplier collects the makeup sample in the first month of the quarter. The routine sample must then be collected no less than one week after collecting the makeup sample and before the end of the quarter.

 If one of the two M&R violations is for failing to collect every additional routine sample (at least three) in the month following a coliform positive, the system <u>will not be eligible for the opportunity</u> to continue monitoring quarterly. Therefore, it is important to stress to the system that every additional routine sample must be collected. DMCE mails a letter to notify the system of the opportunity to collect makeup and routine samples and informs the system's regulator by email. Failing to collect the two samples the following quarter will increase the system's colliform monitoring to monthly.

Eligibility to return to quarterly monitoring:

- 4. The system will need <u>12 consecutive months</u> of coliform sampling with <u>no</u> <u>M&R violations</u> or <u>coliform investigations triggered</u>. A total coliform positive with repeat samples collected and submitted on time that are all coliform absent is not a violation.
- 5. A site visit is required within the previous 12 months to ensure no sanitary defects. Defects found must have been corrected and documented. At the regulator's discretion, a site visit could be substituted by speaking with the system's operator and receiving photos to document that the water system infrastructure has no sanitary defects.
- 6. The system must also have a protected source, meaning that that there are no priority source-related significant deficiencies, verified by a site visit or photos.
 - a. <u>Priority source deficiencies</u> could be a physical pathway to contamination. These are deficiencies that require correction before granting reduced monitoring back to quarterly. The priority source deficiencies are:
 - i. Sanitary seal/casing not watertight
 - ii. No screen on existing well vent
 - b. <u>Non-priority source deficiencies</u> are not considered critical to correct before returning the sampling frequency to quarterly. The non-priority source deficiencies are:
 - i. Well does not meet setback from hazards
 - ii. Wellhead not protected from flooding
 - iii. No raw water sample tap
 - iv. No treated water sample tap
- 7. If the system currently meets the criteria to return to quarterly monitoring, submit a schedule change request form to DMCE within 30 days. Also inform the water supplier when their next coliform sample is due.