



REVISED COLIFORM REGULATIONS AND HOW THEY EFFECT COMPLIANCE



TODAY'S AGENDA

- Monitoring requirement differences between TCR and RTCR
- Triggers for investigations
- Violations under the revised regulations

REVISED COLIFORM REGULATIONS
WENT INTO EFFECT ON 4/1/16 SO....

... Ready or not –
here we go





DEFINITIONS

- Seasonal system
 - Water system that operates only part of the year. i.e. The annual operating period is not January 1 to December 31
- Level 1 (L1) Investigations
 - A review of the water system facilities conducted by the water system staff or their designee
- Level 2 (L2) Investigations
 - A review of the water system facilities conducted by the regulating agency



ROUTINE MONITORING

- On April 1 2016 the Routine Monitoring schedule stayed the same for all systems EXCEPT seasonal systems
 - Seasonal systems - working on changing the schedule to be monthly



ROUTINE MONITORING

- Quarterly monitoring will be increased to monthly if:
 - A level 2 investigation is triggered for any reason
 - Not correcting defects under a Level 1 investigation
 - Potential future violation to be discussed
 - 2 monitoring violations within 12 months
 - This is not collecting the sample – reporting it late will not result in a reduction in their schedule



REPEAT MONITORING

- All systems need to collect only 3 repeat samples in distribution
 - OAR 333-061-0036 (6)(g)(E) – How to treat repeat samples collected at a ground water source is for hand pumps.
- Due date is 11 calendar days after the original sample collection date
 - This is the same as we have been doing following *E. coli* routines
 - Used as a trigger for investigations (about to be discussed)



REPEAT MONITORING

- Triggered samples are still required under the ground water rule
- Except for hand pumps - The triggered source sample does not count as a repeat sample.



TEMPORARY ROUTINE MONITORING (IN RULES AS "ADDITIONAL ROUTINE MONITORING")

- Only required for systems on quarterly monitoring
 - NC or NTNC systems using ground water with a population less than 1000.
 - State reg systems (although still not generating violations)
- Now only 3 samples instead of 5
 - 3 different sites
 - OR
 - 3 different days



INVESTIGATIONS

(FORMS WILL BE COVERED TOMORROW)

- Level 1 investigation triggers
 - Total Coliform Present samples:
 - 2 if less than 40 monthly Coliform Sample
 - More than 5% if 40 or more coliform samples
 - Not taking any/enough repeats following a total coliform routine



INVESTIGATIONS

(FORMS WILL BE COVERED TOMORROW)

- Level 2 investigation triggers
 - E. coli MCL violation (next topic)
 - 2nd Level 1 trigger within 1 year



NO LONGER VIOLATIONS

- Total Coliform MCL
- Repeat Coliform – Did Not report ANY
- Repeat Coliform – Did Not report Enough

- No longer a distinction on Routine violations between did not report ANY and did not report enough



VIOLATIONS STARTING NOW

- *E. coli* MCL
 - Same criteria as before – a combination of an *E. coli* present and a total or *E. coli* present between routine and repeat samples
 - New – *E. coli* present routine sample and not doing any or enough of the repeat samples (We had issued repeats violation but upgraded the PN to tier 1 boil)



VIOLATIONS STARTING NOW

- Monitoring & Reporting
 - Not taking any or enough routine samples and reporting on time.



POTENTIAL VIOLATIONS IN THE FUTURE

- Not completing Level 1 investigation
- Not correcting defects after a Level 1 investigation
- Not allowing the regulating agency to perform a Level 2 investigation
- Not correcting defects after a Level 2 investigation
- Not submitting seasonal checklist on time



QUESTIONS?

Chuck Michael
Compliance Officer
971 – 673 – 0420
Charles.E.Michael@state.or.us