
How to RTC violations

Round robin

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Drinking Water Services
Oregon Public Health Division

Overview

Return to Compliance (RTC)

- When violations Auto-RTC and when Manually RTC
- Criteria to RTC
- Procedure to RTC
- Quiz



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Return to Compliance (RTC)

Some violations are RTC'd automatically but others need to be manually RTC'd.

How do you determine if a violation is auto RTC'd?



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Look at the violation page (click on [Violations](#)):

92038 Violations | Data Online | Oregon Drinking Wat...

[Introduction](#) :: [Data Search Options](#) :: [WS Name Look Up](#) :: [WS ID Look Up](#) :: [DWS Home](#) :: [Quick Data Links](#)

PWS ID: [92038](#) ---- DRIFT CREEK LANDING

For questions regarding these violations contact: REGION 2 ---- Laura Burns ---- (541) 726-2587 ext 23

Violations are displayed for the last 5 years only.

Group Abbreviations: GWR = Ground Water Rule, LCR = Lead & Copper Rule, SWTR = Surface Water Treatment Rule, TCR = Total Coliform Rule

Gray shading indicates return to compliance.

[Hide Auto-RTC](#) | [Show Determination Dates](#)

[Click here](#) to see public notices.

Violation History								
Violation Number	Auto-RTC?	Monitoring Period Begin	Monitoring Period End	Facility ID	Analyte Group	Violation Type - Analyte Count <i>Show analytes for all violations</i>	Enforcement Action - Date <i>Show history</i>	Points
3464303	Y	Feb 01, 2015	Feb 28, 2015		TCR	Routine Coliform - Did Not Report Enough - 1		1
3464298	N	Mar 01, 2014	Mar 31, 2014	WTP-A	GWR	Monthly GW Compliance Report - Late/Nonreporting - 1	Returned To Compliance - Jul 23, 2014	1
3464297	N	Feb 01, 2014	Feb 28, 2014	WTP-A	GWR	Monthly GW Compliance Report - Late/Nonreporting - 1	Returned To Compliance - Jul 23, 2014	1
3464299	N	Jan 01, 2014	Jan 31, 2014	SWTR	SWTR	Public Notice Late/Nonreporting (Viol # 3464296) - 1	Returned To Compliance - Jul 23, 2014	1
3464296	N	Jan 01, 2014	Jan 31, 2014	WTP-A	SWTR	Turbidity Standards Not Met (95% NTU) - 1	Returned To Compliance - Jul 23, 2014	10
3464295	N	Dec 01, 2013	Dec 31, 2013	SWTR	SWTR	Turbidity Standards Not Met (95% NTU) - 1	Returned To Compliance - Jul 23, 2014	10
3464294	N	Nov 01, 2013	Nov 30, 2013	WTP-A	SWTR	Turbidity Standards Not Met (95% NTU) - 1	Returned To Compliance - Jul 23, 2014	10
3464293	N	Oct 01, 2013	Oct 31, 2013	SWTR	SWTR	Public Notice Late/Nonreporting (Viol # 3464292) - 1	Returned To Compliance - Jul 23, 2014	1
3464292	N	Oct 01, 2013	Oct 31, 2013	WTP-A	SWTR	Turbidity Standards Not Met (95% NTU) - 1	Returned To Compliance - Jul 23, 2014	10
3464291	Y	Apr 01, 2013	Jun 30, 2013		TCR	Routine Coliform - Did Not Report ANY - 1	Returned To Compliance - Jul 17, 2013	1
3464290	N	Jun 01, 2013	Jun 30, 2013	WTP-A	GWR	Monthly GW Compliance Report - Late/Nonreporting - 1	Returned To Compliance - Jul 23, 2014	1

- How do I manually RTC a violation?
 - Look at the RTC criteria
 - Determine if violation has been corrected and the criteria met
 - If criteria has been met, email the info to DMCE



- What is the RTC criteria and where is it?

The screenshot shows the Oregon Health Authority website. The top navigation bar includes the Oregon.gov logo, a search bar, and a language selector. The main navigation bar features categories like Topics A to Z, Data & Statistics, Forms & Publications, News & Advisories, Licensing & Certification, Rules & Regulations, and Public Health Directory. The left sidebar lists various resources, with 'Compliance Resources' highlighted in orange and circled in red. A red arrow points from this link to the 'Oregon RTC Criteria (pdf)' link in the main content area, which is also circled in red. The main content area lists several documents, including 'PNC Resolution Process (pdf)', 'Violation RTC Request (doc)', 'PNC 5-Month Compliance Letter (doc)', and 'Oregon RTC Criteria (pdf)'. A 'More Resources' sidebar on the right lists 'Drinking Water Home', 'Drinking Water Data Online', 'Contact Us', and 'Drinking Water Services'.

Oregon RTC criteria

SS points	Violation Text	PN Tier	Auto RTC	Rule	Info	RTC criteria
10	Chemical MCL based on 1 sample	1	N	Nitrate		Resolve contamination problem or install treatment & 1 quarterly chem report below MCL
10	Chemical MCL based on average of samples	1	N	Nitrate		
5	Chemical MCL based on 1 sample	2	N	Chems not Nitrate		Resolve contamination problem or install treatment & Quarterly RAA below MCL (with sample)
5	Chemical MCL based on average of samples	2	N	Chems not Nitrate		
10	Acute MCL for E.coli	1	N	Coliform		Resolve contamination problem or install treatment & 2 monthly coliform reports without TC+
5/1**	Chemical Late/Nonreporting		Y	Chems***	**5 points if NO3 - all others 1 point	<p>Violations for Yearly or longer monitoring periods: When properly collected sample(s) [including location and time period] reported, whether received late or for next monitoring period</p> <p>Violations for monthly, quarterly or 6-month time periods: When properly collected sample(s) reported for next monitoring period</p>
1	Corrosion Control Late/Nonreporting		N	LCR		
1	Routine Coliform - Did not report any		Y	Coliform		
1	Routine Coliform - Did not report enough		Y	Coliform		
1	Temporary Routine Coliform: Did not report any		Y	Coliform		
1	Temporary Routine Coliform: Did not report enough		Y	Coliform		
1	Monthly SW Report - Late/Nonreporting		Y	SWTR		
1	Source Assessment Sample - Late/Nonreporting		N	GWR		
1	Monthly GW compliance Report - Late/Nonreporting		N	GWR		
1	DBP1 or DBP2 Late/Nonreporting		Y	Chems***		
1	TOC Late/Nonreporting		N	Chems***	Not currently generated	
1	LCR late/Nonreporting		Y	LCR		
5	Failure to Submit CCT Recommendation		N	LCR		
5	Public Education Late/Nonreporting		N	LCR		State receiving confirmation of notification to customers
1	Consumer Notification of Results Late/Nonreporting		N	LCR	Not currently generated	
5	No Qualified Treatment Plant Operator		N	other		Reporting to the state of a certified operator
5	Coliform Investigation Nonreporting	2	N	Coliform		Turn in investigation / makes corrections OR
5	Coliform Investigation Defects Not Corrected	2	N	Coliform		2 consecutive months / 1 quarter without TCR problem
5	Prevented Level 2 Investigation	2	N	Coliform		System allows Level 2 investigation to be performed
5	Failure to install Disinfection	2	N	Coliform		complete installation of disinfection as required
1	Source Sample - Late/Nonreporting		N	GWR		Disinfects - Take and report a source water sample
1	Public Notice Late/Nonreporting		N	CCR/PN		No Disinfection - Distribution sample after Temp Routines State receiving late PN or violation causing PN is RTC
5	Corrosion Control Non-Compliance	2	N	LCR		Resolve problem causing system to not properly treat the water and demonstrate for an entire monitoring period.
10	Failure to maintain 4-log treatment	2	N	GWR		
10	Failure to Maintain EP Disinfection	2	N	SWTR		
10	Failure to Provide Adequate Contact Time, Rate	2	N	SWTR		
10	Turbidity Standards Not Met (95% NTU or MAX NTU)	2	N	SWTR		

***Chems include IOC, SOC, VOC, Arsenic, Nitrate, TOC, RAD and DBP's

Send email to compliance inbox to request violation be RTC'ed

Subject: **RTC for** **-**

(Please paste the completed line above into email's subject line, if submitting by email)

Body of email:

1. What violation type(s) you are requesting be RTC'd?
2. What did the system do to resolve the problem (how are criteria met)?
3. If applicable, give a **link** to the contact report which documents the action(s) the system took to resolve the violation(s), and the date when the corrective action(s) was completed.*

Contact report link (if applicable):

Corrective action completed: Date

- Keeping RTC's current keeps systems from unnecessarily becoming PNC's
- Try to prevent systems from becoming a Priority Non Complier (PNC)
- After a system has been a PNC for 5 months enforcement efforts are increased.
- Quiz!



Pop Quiz!

Closing the loop on violations- Return to Compliance (RTC)

What does a system need to have done to be RTC'd for the following violations? (Bonus – how many points is the violation?)

1. Monthly GW compliance report - Late/Nonreporting
2. Failure to maintain 4-log treatment
3. Chemical MCL based on 1 sample (Nitrate)

Questions?

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