Return To Compliance (RTC) Criteria

Drinking Water Services Partners' Spring Training May 19, 2025



DRINKING WATER SERVICES
Public Health Division

Overview

- · What is RTC?
- RTC criteria
- Requesting an RTC
- Plans moving forward



OREGON HEALTH AUTHORITY

What is RTC?

- PWSs are issued violations when out of compliance with drinking water rules OAR 333-061
- Violations can "return to compliance" to bring PWSs back in line with regulations or standards previously violated.
- Regulators review violations for their PWSs and evaluate if RTC criteria is met.
- · PWSs violations are viewable in Drinking Water Data Online.
- RTC Criteria is primarily set by federal rules.
 - RTC criteria set for Oregon specific rules.



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Where to find violations to RTC?

- · Issued violations specific to PWSs are displayed online.
- A violations page summarizing issued violations for all PWSs is also useful to reference.

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More information for this water system:

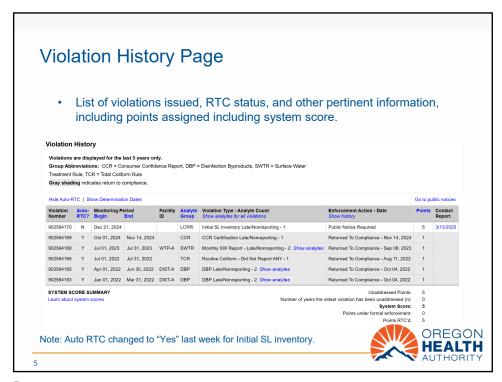
System Info :: Report for Lenders :: Alerts :: Molations :: Compliance & Enforcement :: Contacts & Advisories :: Site Visits :: Public Notice Coliform Summary :: Coliform Results :: Coliform Schedules :: LTZ :: GW/GW/UDI Source Details :: Plan Review :: Annual Fee Chemical Summary :: Chemical Rounds :: Chemical Schedules :: Chemical Schedules Summary :: Arsenic RAA :: Cyanotoxins :: PEAS Lead & Copper :: DBP_Sample_Sites :: EANLs :: MRDL :: GWR 4-Log :: Turbidity :: SWTR :: LRAA :: DW.Source Protection

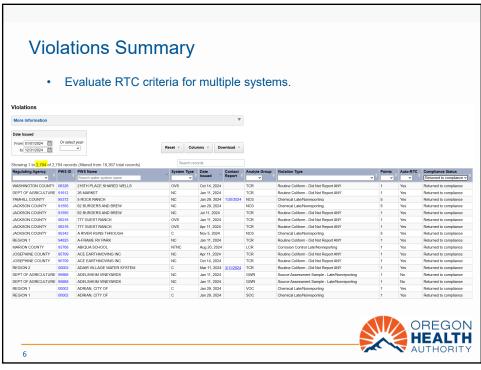
Information for all water systems:

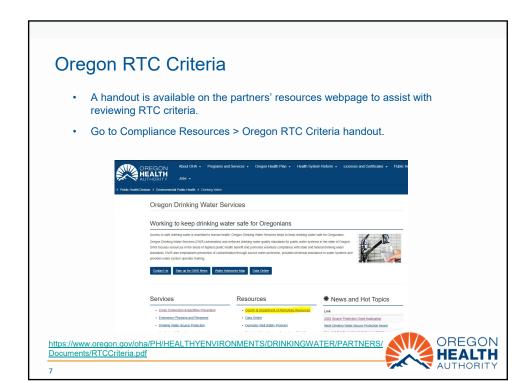
Water_System_Inventory :: Water_System_Surveys :: Outstanding Performers :: Treatment_Plant.Inspections :: Treatment :: Plan Reviews Alerts :: Molations :: Compliance & Enforcement :: Deficiencies :: System Scores :: Exceedances :: Public Notices :: Service Lines Water Advisories :: Contact Reports :: Cyanotoxins :: PEAS :: Post-wildfire VOCs :: Fluoride :: Certification List :: DW Source Protection

Drinking Water Data Online https://yourwater.oregon.gov/
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OREGON HEALTH AUTHORITY







-Cealt	ority			Orego	on RTC criteria	
SS points	Violation Text	PN Tier	Auto	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		
	based on 1 sample	2	_	Chems not Nitrate Chems not		Resolve contamination problem or install treatment & Quarterly RAA below MCL (with sample)
5 Chemical MCL	based on average of samples	2	N	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		L		Chems***	**5 points if NO3 - all others 1 point	
	trol Late/Nonreporting rm - Did not report any	\vdash		LCR Coliform		Violations for Yearly or longer monitoring periods:
	rm - Did not report any rm - Did not report enough	⊢	Y	Coliform		When properly collected sample(s) [including location an
1 Housing Como	utine Coliform: Did not report any	⊢	Y	Coliform		time period] reported, whether received late or for next
	utine Coliform: Did not report enough	⊢		Coliform		monitoring period
	cport - Late/Nonreporting	⊢	-	SWTR	l	
	ment Sample - Late/Nonreporting	⊢		GWR	 	Violations for monthly, quarterly or 6-month time periods
	ompliance Report - Late/Nonreporting	⊢	N	GWR		When properly collected sample(s) reported for next
	Late/Nonreporting	-	-	Chems***		monitoring period
1 TOC Late/Non		⊢		Chems***	Not currently generated	
1 LCR late/Nonr		-	Y	LCR	THOI CUITCHILIY GENERALEG	
	nit CCT Recommendation			LCR		System starts Plan review with the State for the Corrosio Control treatment.
	on Late/Nonreporting			LCR		State receiving confirmation of notification to customers
	ification of Results Late/Nonreporting			LCR	Not currently generated	
	reatment Plant Operator		N	other		Reporting to the state of a certified operator
	estigation Nonreporting	2		Coliform		Turn in investigation / makes corrections OR
5 Coliform Inves	tigation Defects Not Corrected	2	N	Coliform		2 consecutive months / 1 quarter without TCR problem
5 Prevented Lev	el 2 Investigation	2	N	Coliform		System allows Level 2 investigation to be performed
5 Failure to Insta	Il Disinfection	2	N	Coliform		complete installation of disinfection as required
						Disinfects - Take and report a source water sample
1 Source Sample	e - Late/Nonreporting	L	N	GWR		No Disinfection - Distribution sample after Temp Routine
1 Public Notice L	ate/Nonreporting		N	CCR/PN		State receiving late PN or violation causing PN is RTC
5 Corrosion Con	trol Non-Compliance	2	N	LCR		
	stain 4-log treatment	2		GWR		Resolve problem causing system to not properly treat the water and demonstrate for an entire monitoring period.
	tain EP Disinfection	2		SWTR		nate and demonstrate is: all office from only period.
10 Failure to Prov	ide Adequate Contact Time, Swtr dards Not Met (95% NTU or MAX NTU)	2		SWTR		

Oregon RTC Criteria

- SS points: Points assigned for specific violations for the system score.
 - Monitoring & reporting (M&R) 1 pt. vs. treatment technique 5/10 pts.
- Violation Text: Basis for violation
 - MCL, late/nonreporting, failure to maintain treatment
- PN Tier: Public notice requirement for specific violations
 - Labeled as 1 or 2 indicating Tier 1 (24-hour) or Tier 2 (30-day)
- Auto-RTC: yes or no
- Rule: General indicator of rule violation, analyte group
- RTC criteria: Description of corrective actions required for the violation to RTC



| Commont MCL based on 1 sample | 1 w | Metare | 10 | Commont MCL based on 1 sample | 1 w | Metare | 10 | Commont MCL based on 1 sample | 1 w | Metare | 10 | Commont MCL based on 1 sample | 1 w | Metare | 10 | Commont MCL based on 1 sample | 1 w | Metare | 10 | Commont MCL based on 1 sample | 2 h | Metare | 10 | Commont MCL based on 1 sample | 2 h | Metare | 10 | Commont MCL based on sample | 2 h | Metare | 10 | Metare

Auto-RTC

- · Auto-RTC is primarily associated with M&R violations.
 - E.g., PWS no routine coliform bacteria sample reported. Violation will RTC with sample submitted within the next monitoring period.
- If the auto-RTC is marked Yes, the violation will RTC when the late or non-reported sample is reported to the state.
- Violations that do not auto-RTC are marked No and require completed action(s) before RTC is considered.
 - E.g., PWS exceeds nitrate MCL of 10 mg/L, required to resolve contamination problem or install treatment, followed by collecting one quarter to verify nitrate is below MCL.
 - Plan review and/or other supportive documentation may be required.
- Regulators are asked to review/follow up on violations that do not auto-RTC.



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Auto-RTC

- Refer to Data Online violations page and RTC handout.
- · Auto-RTC process occurs monthly.



Violation Number	Auto- RTC?	Monitoring Po	eriod End	Facility ID	Analyte Group	Violation Type - Analyte Count Show analytes for all violations	Enforcement Action - Date Show history	Points	Contact Report
3530368	Y	Jan 01, 2025	Mar 31, 2025		TCR	Routine Coliform - Did Not Report ANY - 1		1	
3530366	Y	Oct 01, 2024	Dec 31, 2024		TCR	Routine Coliform - Did Not Report ANY - 1		1	
3530367	N	Dec 21, 2024			LCRR	Initial SL Inventory Late/Nonreporting - 1	Public Notice Required	5	3/12/2025
3530365	Υ	Jan 01, 2020	Dec 31, 2022	DIST-A	LCR	LCR Late/Nonreporting - 1 Show analyte	Returned To Compliance - Jul 03, 2023	1	11/2/2022



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Requesting an RTC

- All RTC requests are emailed to the DMCE Unit at compliance.dw@odhsoha.oregon.gov
- When submitting an RTC request:
 - Include 'RTC request' in subject line
 - PWS name/ID
 - Violation to RTC (date issued, violation no., description, etc.).
 - · Screen capture of PWS violation from Data Online is appreciated.
 - Describe RTC criteria met
 - Attach supportive documentation not already in Data Online. (links to sample data, contact reports, etc.)



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RTC request example

Greetings Compliance Team!

System: Oceanside (00585)
Topic: Request to RTC DBP Violations

System has had elevated TTHM levels since August 2023. This has resulted in multiple OEL reports and MCL exceedances on May 2024, August 2024, and December 2024 With the 1^{st} quarter 2025 results the system is back in compliance with and <u>LRAA</u> of 0.080 mg/L and OEL of 0.067 mg/L for TTHM.

Action Items: Can we RTC the following DBP violations #903129482, #903129480 and #903129478?

Contact Report about Mitigation Efforts

Please let me know if you have any questions.

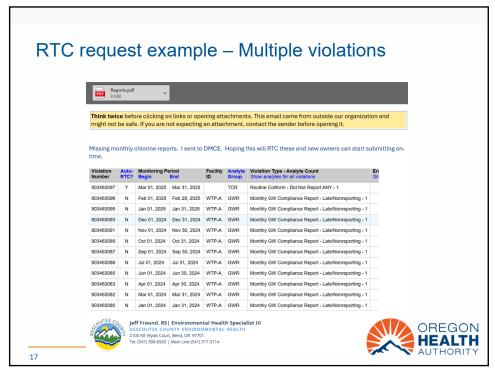
Cheers, Nicole



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From: Alfafar											
				@oha.or	egon.gov>						
Sent: Tuesda To: Complian				re DW/@	odhsoba ora	gon gov>					
							@washingtoncounty	vor.gov>; Dawn	Wair < Da	wn Wair@wa	ashingtoncountyor.gov>;
<larry fenst<="" td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></larry>											
Subject: Mer	iweather N	NGC (916	04): Violati	ion RTC I	Request						
Hi Compliano	e Team!										
System: Meri	iwoathor N	Intional G	olf Course	(01604)							
Topic: Violati											
•											
The system s	amples the	eir source	last mont	h - <u>Colife</u>	orm results						
		PWS	ID: 91604	4 ME	RIWETHER	R NATL GO	OLF COURSE	OR41			
Coliform R	lesults										
See also: Col	iform Fact S	Sheet :: C	Coliform Sch	iedules :	: Archived Re	sults :: Bat	tch Numbers				
Sample types the glossary fo			O=Confirma	ation, MU	=Make-up, RI	P=Repeat, R	RT=Routine, SP=Specia	al, TG=Triggered	. See		
Filter ontions	Show sno	rial campi	les Shou	v rejected	Leamnlee I	nclude resul	Its older than 2022				
· mor opnono				-							
	# Samples	Sample Type	Coliform Type	Result	Sample ID	Repeat of Sample ID	Sample Site	Facility	Chlorine Residual		
Sample Date	Samples			Absent	5050014-01		WELL HEAD	SRC-AA		Feb 21, 2025	
Sample Date Feb 18, 2025	1	AS	Total	Auseni							
Peb 18, 2025 Feb 12, 2025	1	RT	Total	Absent	5044003-01		BAR SINK	DIST-A		Feb 21, 2025	results on 2/21/25?





To summarize...

- Review the RTC criteria when evaluating violations for PWSs.
 Revised handout to be posted online. Coming Soon.
- When requesting RTC of violations, please include necessary information that corrective actions met RTC criteria.
- When unsure about violation RTC criteria, consult with your state regulator for help, point you to rule citations, and share other guidance materials.
- · After RTC request, check violation RTC status in Data Online.
- DMCE Unit compliance team is available to assist.



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Oregon Return to Compliance Criteria							
Rule	Violation Text	RTC Criteria	SS Points	PN Tier	Auto RTC		
litrate	Chemical MCL based on 1 sample	$Remediate \ contamination. \ In stall \ approved \ treatment \ and/or \ removal \ of \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ source \ contamination \ \& \ 1 \ quarterly \ chemoval \ or \ chemoval \ or \ chemoval \ chemo$	10	1	N		
litrate	Chemical MCL based on average of samples	report below MCL	10	1	N		
litrate	Chemical late/Nonreporting	For yearly: when properly collected sample reported, whether received late or for next monitoring period. For monthly, quarterly: When properly collected sample(s) reported for next monitoring period.	5		Υ		
Chems	Chemical MCL based on 1 sample	Paralle controlled a control of the second s	5	2	N		
Chems	Chemical MCL based on average of samples	Resolve contamination problem or install treatment & quarterly RAA below MCL (with sample)	5	2	N		
Chems	Chem Late/Nonreporting	Violations for Yearly or longer monitoring periods: When properly collected sample(s) [including location and time	1		Υ		
Chems	DBP Late/Nonreporting	period] reported, whether received late or for next monitoring period. Violations for monthly and quarterly: When properly collected sample(s) reported for next monitoring period.	1		Υ		
hems/ oliform	Chlorine residual	When properly collected sample reported, whether received late or for next monitoring period.					
oliform	Acute MCL for E. coli	Resolve contamination problem or install treatment & 2 monthly coliform reports without TC+	10	1	N		
Coliform	Repeat Coliform - Late/Non-reporting	OVS systems, next quarters routine sample is submitted	5				
Coliform	Coliform Investigation Nonreporting Coliform Investigation Defects Not Corrected	Turn in investigation / make corrections OR 2 consecutive months / 1 quarter without TCR problem.	5 5	2	N N		
Coliform	Prevented Level 2 Investigation	System allows Level 2 investigation to be performed.	5	2	N		
	Failure to Install Disinfection	Complete installation of disinfection as required.	5	2	N		
	Routine Coliform - Did not report any	and the second s	1		Y		
Coliform	Routine Coliform - Did not report enough		1		Υ		
	Temporary Routine Coliform: Did not report any	Properly collected sample(s) when reported on time, for next monitoring period	1		Y		
oliform	Temporary Routine Coliform: Did not report enough		1		Υ		
		Resolve problem causing system to not properly treat the water and demonstrate for an entire monitoring period.		_			
SWR	Failure to maintain 4-log treatment	New annual formed in	10	2	N N		
SWR	Source Assessment Sample - Late/Nonreporting	Next source sample turned in.	1		N N		
SWR	Monthly GW compliance Report - Late/Nonreporting	Next monthly report received on time.	1		N		
SWR	Source Sample - Late/Nonreporting	DISINFECTION - Take and report a source water sample NO DISINFECTION - report 3 absent distribution samples	1		N		
				ORE HE	GO ALT I		

Rule										
	Violation Text	RTC Criteria	SS Points	PN Tier	Auto RTC					
SWTR I	Failure to Maintain EP Disinfection		10	2	N					
SWTR I	Failure to Provide Adequate Contact Time, SWTR		10	2	N					
SWTR 1	Turbidity Standards Not Met (95% NTU)	Resolve problem causing system to not properly treat the water and demonstrate for an entire monitoring period.	10	2	N					
SWTR 1	Turbidity Standards Not Met (MAX NTU)		10	1	N					
SWTR I	Monthly SW Report - Late/Nonreporting	Next monthly report received on time.	1		Υ					
.CR I	Failure to Submit CCT Recommendation	Recommendation for the Corrosion Control treatment received and approved.	5		N					
	Public Education Late/Nonreporting	State receiving confirmation of notification to customers	5		N					
.CR (Corrosion Control Non-Compliance	Resolve problem causing system to not properly treat the water and demonstrate for an entire monitoring period	5	2	N					
.CR (Corrosion Control Late/Nonreporting	Next montfilly report received on time.	1		N					
.CR I	LCR late/Nonreporting	When properly collected sample(s) reported for next monitoring period	1		Υ					
.CR I	Lead PN Late/Nonreporting	State receiving late PN	1		N					
.CR I	Initial SL Consumer Notification Late/Nonreporting	State receiving late Initial SL Consumer Notification			N					
.CR I	Repeat SL Consumer Notification Late/Nonreporting	State receiving late repeat SL Consumer Notification			N					
SLI I	Initial SLI Late/nonreporting	State receiving late Initial SLI	5		N					
SLI I	Repeat SLI Late/nonreporting	State receiving late Repeat SLI			N					
.CR I	LCR Consumer Notice	State receiving late Consumer Notice.			N					
PN I	Public Notice Late/Nonreporting	State receiving tate PN or violation	1		N					
	CCR Late/Nonreporting	State receiving late CCR	1		N					
	CCR Certification Late/Nonreporting	State receiving late Certification	1		N					
	Seasonal Startup Late/Nonreporting	State receiving late Seasonal Startup report			N					
	No Qualified Treatment Plant Operator	Reporting to the state of a certified operator	1		N					

Plans moving forward...

New violations/RTC criteria by 2026:

- · Plans to issue new violations, includes PWSs outreach:
 - *Reporting disinfectant residual with coliform sampling
 - *No certified completion of seasonal startup for PWSs
 - *Not sending L&C results to customers that participated in sampling
 - Exceeding Maximum Residual Disinfectant Level (MRDL) RAA
 - Significant deficiencies unresolved
- Reviewing existing violations that can auto-RTC.
- Plan to add link to RTC criteria to Data Online violations page for easier access.

* Likely an auto-RTC process



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Thanks! Please send your feedback...



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