Requirements for Small Systems on Monthly Monitoring

WHO DOES THIS FACTSHEET APPLY TO?
ALL PUBLIC WATER SYSTEMS (PWSs), REGARDLESS OF SOURCE, THAT SERVE 1,000 PEOPLE OR FEWER and collect at least one routine total coliform (TC) SAMPLE MONTHLY.

RTCR
What to Do?

Step 1
Develop/update your sample siting plan.

Step 2
Collect your drinking water samples.

Step 3
Conduct required actions.

Additional RTCR Factsheets:

- Requirements for Small Systems on Quarterly Monitoring
- Requirements for Seasonal Systems
- Repeat Monitoring Requirements for Small Systems
- Level 1 & Level 2 Assessments and Corrective Actions

ATTENTION!
All PWSs must comply with the RTCR requirements starting April 1, 2016.

STEP 1: DEVELOP/UPDATE YOUR SAMPLE SITING PLAN*

Contact your Idaho field office for assistance.

- DEVELOP A SAMPLE SITING PLAN AND HAVE IT READY FOR USE BY APRIL 1, 2016. If you already have a sample siting plan for the Total Coliform Rule (TCR), update this plan to meet the requirements of the RTCR.
  - LIST THE LOCATIONS WHERE YOU WILL TAKE YOUR SAMPLES (ROUTINE AND REPEAT): Any repeat sampling location that is also used for GWR triggered source water monitoring must be included.
  - INCLUDE YOUR ROUTINE COLLECTION SCHEDULE: For example, “[PWS_ID] will collect one routine total coliform sample every first Monday of the calendar month.”
  - UPDATE TO REFLECT CHANGES AT YOUR PWS: The sample siting plan is a living document and should be updated to reflect changes at your PWS such as: major changes in population; a new or additional water source; infrastructure changes, such as a change in the distribution system (i.e. extended/abandoned lines) or pressure zones; or changes in disinfection or other treatment.

STEP 2: COLLECT YOUR DRINKING WATER SAMPLES

Know your RTCR routine sampling requirements.

- COLLECT AT LEAST ONE 100 ML routine drinking water sample every calendar month.
- IMMEDIATELY SEND YOUR SAMPLE TO A STATE-CERTIFIED LAB that performs total coliform drinking water analyses.
  - Remember the lab must begin analyzing the drinking water sample no later than the 30th hour from the collection time.
  - If necessary, ship the sample overnight and refrigerate or ice the sample using “blue” ice (cooled to about 4° to 10° C).

NOTE
* The sample siting plan is subject to review and revision.
STEP 3: CONDUCT ACTIONS REQUIRED AS A RESULT OF YOUR SAMPLING

Was your routine sample total coliform-positive (TC+)?

**YES**

For each TC+ sample, do the following TWO ACTIONS:

1. Make sure the lab tests each TC+ sample for *E. coli* (*Idaho Labs automatically perform this test*); AND

2. Within 24 hours of being notified of the TC+ sample, take 3 repeat samples; *

See the RTCR Factsheet: Repeat Monitoring Requirements for Small Systems.

**NO**

Continue with routine monitoring schedule, according to your sample siting plan.

If any repeat sample is TC+ (or TC is present):
Call your Idaho field office immediately and tell them you triggered an assessment. The field office staff will help you identify which type of assessment is required.

See the RTCR Factsheet: Level 1 & 2 Assessments and Corrective Actions.

**NOTE:** You may have to comply with other requirements triggered by a TC+ sample (e.g. Public Notification, Recordkeeping).

Contact your Idaho field office for more information.

Call your Idaho field office! The DEQ of Health District Staff* will perform a Level 2 Assessment if the PWS has any of the following occurrences:

- TC+ Routine and EC+ Repeat sample;
- EC+ Routine and TC+ Repeat sample;
- The PWS fails to take and analyze all 3 required repeat samples following an EC+ routine sample; or,
- The PWS fails to test for *E. coli* when any repeat sample is TC+.

Tier 1 Public Notification is required within 24 hours.

*DEQ may authorize an alternative party to perform the Level 2 Assessment.

See RTCR Factsheet: Level 1 & 2 Assessments and Corrective Actions.

**NOTES**

* If you miss any routine or repeat sample, contact your Idaho field office.

** Call your Idaho field office on the same day you learn of the EC+ result, or by the end of the next business and tell them you received an EC+ result.