Repeat Monitoring Requirements For Small Systems

**WHO DOES THIS FACTSHEET APPLY TO?**

All Public Water Systems (PWSs) serving 1,000 or fewer people that are required to conduct repeat monitoring when a water sample is positive for total coliform (TC+) bacteria.

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### RTCR

**What to Do?**

1. **Step 1**
   - Collect 3 repeat samples after each TC+ routine sample

2. **Step 2**
   - Conduct required actions after collecting repeat samples

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### Additional RTCR Factsheets:

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

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### ATTENTION!

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

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### Step 1: Collect 3 repeat samples for each Routine TC+ Sample

You must collect a set of 3 repeat samples after each TC+ routine sample. You must continue to collect a set of 3 repeat samples until either TC is not detected in one complete set of repeat samples or you trigger an assessment.

**Repeat Sampling Locations**

You must collect at least 3 repeat samples at the locations described in your sample siting plan: (1) 1 repeat sample at the original routine location, (2) 1 repeat sample within five service connections upstream, and (3) 1 repeat sample within five service connections downstream of the TC+ sample. You may choose alternative repeat sampling locations on a situational basis—contact your state for more information.

- **Site A** = 1 repeat upstream
- **Site B** = 1 repeat upstream
- **Site C** = 1 repeat downstream

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### ATTENTION!

**Collect all 3 repeat samples.**

If you do not collect and analyze at least 3 repeat samples (for each routine TC+) you will have to perform a Level 1 or Level 2 assessment. See the RTCR Factsheet: Level 1 & Level 2 Assessments and Corrective Actions.

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### Ground Water Systems

Remember to also sample from each active ground water source (Ground Water Rule).

### Frequency & Timing

Collect all 3 repeat samples within **24 hours** after receiving notification from the state-certified lab of the TC+ sample result. The repeat samples must be taken on the same day.

- 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).

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### NOTES

*CALL YOUR Idaho field office on the same day you learned of the E. coli-positive (EC+) result, or by the end of the next business day if the result came in after business hours and tell them you received an EC+ result.*

**Contact your Idaho field office for an approved extension if logistical problems prevent collection within 24 hours or if you only have one sample tap.**
**STEP 2: CONDUCT ACTIONS REQUIRED AS A RESULT OF YOUR REPEAT SAMPLING**

- **TC+** = Total coliform-positive or present; **TC−** = Total coliform-negative or absent
- **EC+** = *E. coli*-positive or present; **EC−** = *E. coli*-negative or absent; **EC?** = *E. coli* not analyzed

You must **COMPLETE AN ASSESSMENT AND SUBMIT THE FORM TO THE STATE WITHIN 30 DAYS** after you learned your PWS has triggered an assessment. See the RTCR Factsheet: Level 1 & Level 2 Assessments and Corrective Actions.

<table>
<thead>
<tr>
<th>If Routine Sample Is:</th>
<th>And</th>
<th>Any Repeat Sample Is:</th>
<th>Action: What do your sample results mean?</th>
<th>Violation</th>
</tr>
</thead>
</table>
| TC+ EC−               | &   | TC+ EC−                | The presence of total coliform bacteria in both your original routine sample and in your follow-up repeat sample suggests there could be a problem and your water may not be safe to use.  
  **CONDUCT A LEVEL 1 OR LEVEL 2 ASSESSMENT.** Contact the Idaho field office for help determining which type of assessment is required. | No MCL violation |
| TC+ EC−               | &   | TC+ EC?                | The presence of total coliform bacteria in both your original routine sample and in your follow-up repeat sample suggests there could be a problem and because *E. coli* was not tested, it is unknown whether or not the water is safe to use.  
  1. **NOTIFY THE IDAHO FIELD OFFICE** within 24 hours of receiving sample results  
  2. **THE DEQ OR HEALTH DISTRICT WILL CONDUCT A LEVEL 2 ASSESSMENT.**  
  3. **ISSUE A PUBLIC NOTICE (PN).** | *E. coli* MCL violation* |
| TC+ EC−               | &   | TC+ EC+                | The presence of *E. coli* bacteria in your water is an indicator of fecal contamination and your water may not be safe to use.  
  1. **NOTIFY THE IDAHO FIELD OFFICE** within 24 hours of receiving sample results  
  2. **THE DEQ OR HEALTH DISTRICT WILL CONDUCT A LEVEL 2 ASSESSMENT.**  
  3. **ISSUE A PUBLIC NOTICE (PN).** | *E. coli* MCL violation* |
| TC+ EC−               | &   | Any or all repeat samples missing | The presence of total coliform bacteria in your original routine sample suggests there could be a problem and because repeat samples were not tested, it is unknown whether or not the water is safe to use.  
  **CONDUCT A LEVEL 1 OR LEVEL 2 ASSESSMENT.** Contact the Idaho field office for help determining which type of assessment is required. | No MCL violation |
| TC+ EC+               | &   | TC+                    | The presence of *E. coli* bacteria in your water is an indicator of fecal contamination and your water may not be safe to use.  
  1. **NOTIFY THE IDAHO FIELD OFFICE** within 24 hours of receiving sample results  
  2. **THE DEQ OR HEALTH DISTRICT WILL CONDUCT A LEVEL 2 ASSESSMENT.**  
  3. **ISSUE A PUBLIC NOTICE (PN).** | *E. coli* MCL violation* |
| TC+ EC+               | &   | Any or all repeat samples missing | The presence of *E. coli* bacteria in your water is an indicator of fecal contamination and your water may not be safe to use.  
  1. **NOTIFY THE IDAHO FIELD OFFICE** within 24 hours of receiving sample results  
  2. **THE DEQ OR HEALTH DISTRICT WILL CONDUCT A LEVEL 2 ASSESSMENT.**  
  3. **ISSUE A PUBLIC NOTICE (PN).** | *E. coli* MCL violation* |

**NOTE**  
*You are required to provide Tier 1 public notice within 24 hours in response to an *E. coli* MCL violation.*

February 2016