



FACT SHEET: Revised Total Coliform Rule

(RTCR)

Level 1 & Level 2 Assessments and Corrective Actions

WHO DOES THIS FACT SHEET APPLY TO?

ALL PUBLIC WATER SYSTEMS (PWSs) that must conduct a Level 1 or Level 2 assessment.

RTCR

What to know?

- What is an Assessment?
- What to do if the PWS triggered an assessment.



Additional RTCR Fact Sheet:

- Monthly Monitoring Requirements

FOR ASSISTANCE, PLEASE CONTACT

THE SDWB COMPLIANCE SECTION:

PHONE: (808) 586-4258

ON HAWAII ISLAND:

THERESA MCGEEHAN-TAKIUE

PHONE: (808) 933-0407

ATTENTION!

Starting April 1, 2016, all public water systems (PWSs) must comply with the RTCR.

WHAT IS AN ASSESSMENT?

When sampling results show that your PWS may be vulnerable to contamination, PWSs must perform an assessment (Level 1 or Level 2) and **FIND AND FIX ANY "SANITARY DEFECTS."** A sanitary defect can provide a pathway of entry for microbial contamination into the distribution system or indicate imminent failure in an existing barrier (e.g. cracked tank, rat droppings on wellheads, or broken seals).

THERE ARE 5 BASIC ELEMENTS TO INVESTIGATE DURING AN ASSESSMENT:

- Atypical events that may affect distributed water quality or indicate that distributed water quality was impaired;
- Changes in distribution system maintenance and operation, including water storage;
- Water source and treatment methods that affect distributed water quality;
- Inadequacies in sample sites, sampling protocol and sample processing; and
- Existing water quality monitoring data.

A LEVEL 2 ASSESSMENT IS A MORE COMPREHENSIVE AND IN-DEPTH EXAMINATION COMPARED TO A LEVEL 1 ASSESSMENT because the cause of the Level 2 assessment is more critical and likely to result in a direct public health impact.

- A Level 2 assessment must be conducted by the state or a party approved by the state. A Level 1 assessment is conducted by the PWS.
- After learning that you triggered the assessment, you have 30 days to complete, correct sanitary defects found, and submit the form to the Safe Drinking Water Branch (SDWB) . For sanitary defects found but NOT fixed within the 30 days, you must work with the SDWB to establish an approved schedule for all incomplete corrective actions. **AFTER COMPLETING EACH SCHEDULED CORRECTIVE ACTION, YOU MUST NOTIFY YOUR STATE TO AVOID VIOLATIONS.** Throughout the Assessment Process **CONSULT WITH THE SDWB** to discuss progress.

Examples of Common Causes of Contamination	Example Common Corrective Action(s)
Failure of chlorination equipment	<ul style="list-style-type: none"> ✓ Repair/replacement of equipment ✓ Tracking chlorine residual readings and keeping log
Loss of system pressure	<ul style="list-style-type: none"> ✓ Maintenance of adequate pressure ✓ Valve maintenance
Cross connections	<ul style="list-style-type: none"> ✓ Maintenance of adequate pressure ✓ Installation of backflow prevention assembly/device ✓ Implementation/upgrade of cross connection control program

WHAT TO DO IF THE PWS TRIGGERED AN ASSESSMENT?

WITHIN 30 DAYS OF LEARNING THAT YOUR PWS TRIGGERED AN ASSESSMENT, a completed state assessment form must be submitted to the SDWB. The process for completing and submitting the required form depends on the type of assessment. In both cases, the SDWB will review the completed assessment form to determine if the likely cause of the trigger has been identified and to ensure the problem is corrected.

Level 1 Assessment

You have to do a Level 1 Assessment if you:

1. Fail to collect and analyze at least 3 repeat samples for each routine total coliform + (TC+); or
2. Have two or more TC+ samples (use routine and repeat results in your calculation) in one month; or
3. Have more than 5.0% of samples TC+ in one month (for systems collecting 40 or more samples/month.)



Your system conducts the assessment.

STEP 1: Call the SDWB, and verify the appropriate person to conduct the assessment (the assessor).

STEP 2: Ask the state for the Level 1 assessment form and determine the process for submission.

STEP 3: Perform the assessment.

STEP 4: If sanitary defect(s) are found, fix them or propose and gain a state-approved schedule for fixing, if the sanitary defect(s) cannot be corrected within 30 days of triggering the assessment.

- After completing each scheduled corrective action you must notify the SDWB and provide documentation.
- The PWS or state (at any time) may consult with each other to discuss progress or the corrective action(s) identified.

STEP 5: Submit the completed assessment form to the SDWB within 30 days of learning that your system triggered the assessment.

Level 2 Assessment

You have to do a Level 2 Assessment if you have either:

1. *E. coli* MCL violation:

Routine	Repeat
TC+ & EC-	<i>E. coli</i> -positive (EC+)
TC+ & EC-	TC+ but not analyzed for EC
TC+ & EC+	TC+
TC+ & EC+	One or more samples is missing

2. Two Level 1 assessments triggered in a rolling 12-month period.

A state-approved inspector or the state must conduct the assessment.

STEP 1: Call the SDWB to select the appropriate person to conduct the assessment (the assessor).

— **Assessors may be the state, qualified staff from your system, or a qualified third party.**

STEP 2: The assessor will obtain the Level 2 assessment form.

STEP 3: Have the assessment performed.

STEP 4: If sanitary defect(s) are found, fix them or propose and gain a state-approved schedule for fixing, if the sanitary defect(s) cannot be corrected within 30 days of triggering the assessment.

- After completing each scheduled corrective action you must notify the SDWB and provide documentation.
- The PWS or state (at any time) may consult with each other to discuss progress or the corrective action(s) identified.

STEP 5: Submit the completed assessment form to the SDWB within 30 days of learning that your system triggered the assessment.

NOTES—Your PWS will get a treatment technique violation if you:

- Fail to perform an assessment or take corrective action; or,
 - Fail to submit the completed assessment form to the SDWB within 30 days of learning that it triggered the assessment.
- You are required to provide Tier 2 public notice within 30 days in response to a treatment technique violation.