

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

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DWS Circular Letter #2013-04

To: Public Water Systems

From: Lori Mathieu, Public Health Section Chief
Drinking Water Section 

Date: August 27, 2013

Subject: Revisions to the Total Coliform Rule

On February 13, 2013, the U.S. Environmental Protection Agency (EPA) published the Revised Total Coliform Rule (RTCR) in the Federal Register. This rule will apply to all public water systems, and when compliance begins on April 1, 2016, all water system will see changes to how they monitor coliform and react to positive samples.

The main goal of the RTCR is to enhance public health protection by identifying the presence of "sanitary defects". Sampling results can trigger one of two different levels of assessment designed to take a close look at the entire system and its operation to identify whether there are any sanitary defects that could have caused the coliform positive results. This is a proactive approach that should lead to the identification and correction of problems that may compromise public health in an effort to reduce cases of illnesses and deaths due to potential fecal contamination and waterborne pathogen exposure.

Below is an overview of the main requirements and changes outlined in the RTCR:

1. Requires systems to investigate, identify and correct any sanitary defects found whenever monitoring results show a system may be vulnerable to contamination. There will be two levels of assessments required, depending on the severity and frequency of contamination. The assessments and corrective action required will help lead to a decrease in total coliform and *E. coli* occurrence in drinking water; and this decrease should reduce the potential risk to human health.
2. Defines sanitary defect: "a defect that could provide a pathway of entry for microbial contamination into the distribution system or that is indicative of a failure or imminent failure in a barrier that is already in place". *NOTE: A sanitary defect is different than a significant deficiency per GWR.*



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3. Establishes a Treatment Technique which will replace the MCL/MCLG for total coliforms (TC), with Public Notifications required only for Treatment Technique violations (failure to conduct a required assessment or fix an identified sanitary defect). Multiple TC positive results alone (without E. coli detection) will no longer trigger a MCL violation or require PN. The State determines if the system has identified the likely cause(s) of the TC positive results and the treatment technique trigger and, if the system has corrected the problem(s).
4. Keeps E. coli as the health indicator with an MCLG of zero and MCL similar to the current TCR. Fecal coliform is no longer used as an indicator. The “acute” TC MCL violation according to the 1989 TCR becomes the new MCL violation for E-coli, and will require a Tier 1 PN.
5. Requires increased monitoring for high-risk small ground water systems (< 1,000 people) with unacceptable compliance history.
6. Monitoring requirements:
 - For systems serving $\leq 1,000$ persons reduces the required number of repeat samples to three (from four under the current TCR)
 - Provides flexibility in the location of sites for repeat samples, and allows the use of dedicated sampling stations
 - The number of additional routine samples required in the month following one or more total coliform-positive samples for systems collecting samples on a quarterly or annual frequency is reduced to three. Systems on monthly monitoring are exempt from this requirement entirely, simply continuing with their normal routine monthly schedule.
7. Defines “seasonal systems”, requires start-up procedures and sampling during high vulnerability periods during the seasonal operation. The default routine monitoring frequency for a seasonal PWS will be on a monthly basis.
8. Allows systems to transition at their current monitoring frequency for GW systems serving less than 1,000 people. The State will re-evaluate the TC monitoring frequency during each sanitary survey cycle.

Presently the DWS is closely working with EPA and intends to initiate regulation development this fall.

Please look to the DPH – DWS website for more information as it becomes available or contact the DWS at 860-509-7333.

CC: Local Directors of Health
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