

Part C

RTCR Compliance Checklist

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C. RTCR Compliance Checklist

What do I do if I have a ...?



This section provides a checklist of actions systems must take if they have a violation or certain events occurred (for example, a total coliform-positive sample, an *E. coli*-positive sample or an assessment trigger) during their monitoring period. Systems must take appropriate actions to protect public health in a timely manner, for example, notify the drinking water primacy agency, issue public notification, conduct an assessment, monitor at a more frequent rate, etc. **EPA recommends that systems go through the entire checklist**, excluding the items that are not applicable to them – for example, for community water systems, skip the items that are specific to non-community water systems.

Table C-1. List of Items to Check to Determine Compliance

ITEMS TO CHECK	YES	NO
A. Do you have a total coliform-positive routine sample?		
If you answered yes, take the following action(s):		
▪ Take 3 repeat samples within 24 hours of being notified of your result. Send these samples to the lab immediately.		
▪ Make sure that your lab tests the total coliform-positive routine sample for the presence of <i>E. coli</i> .		
If you answered no, continue with your routine monitoring.		
B. Do you have a total coliform-positive repeat sample?		
If you answered yes, take the following action(s):		
▪ Make sure that your lab tests the total coliform-positive routine sample for the presence of <i>E. coli</i> .		
C. Do you have an <i>E. coli</i>-positive routine sample?		
If you answered yes, take the following action(s):		
▪ Notify your drinking water primacy agency by the end of the day when you learn of the positive result, or by the end of the next business day if you learn of the positive result after the agency office is closed and the agency has no after-hours notification system.		

ITEMS TO CHECK	YES	NO
D. Do you have an <i>E. coli</i> MCL violation?		
▪ An <i>E. coli</i> -positive repeat sample following a total coliform-positive routine sample.		
▪ A total coliform positive repeat sample following an <i>E. coli</i> -positive routine sample.		
▪ Failure to collect all required repeat samples following an <i>E. coli</i> -positive routine sample.		
▪ Failure to test for <i>E. coli</i> when any of the repeat samples is total coliform-positive.		
If you answered yes to any of the items in “D” above, take the following action(s):		
▪ Report the violation to your drinking water primacy agency as soon as practical but no later than 24 hours after learning of the violation.		
▪ Notify the public by issuing a Tier 1 public notification as soon as practical but no later than 24 hours after learning of the violation.		
▪ Make sure a Level 2 assessment is conducted. See Item F.		
▪ If you are on quarterly or annual monitoring, go to monthly monitoring beginning the following month.		
E. Did you trigger a Level 1 assessment?		
▪ Two or more total coliform-positive samples in the same sampling period (include results of both routine and repeat samples).		
▪ Failure to take every required repeat sample after any single routine total coliform-positive sample.		
If you answered yes to any of the items in “E” above, take the following action(s):		
▪ Check with your drinking water primacy agency to determine who can conduct a Level 1 assessment and which forms to use.		
▪ Conduct the Level 1 assessment, correct all sanitary defects found and submit form to your drinking water primacy agency within 30 days of learning of the trigger.		
F. Did you trigger a Level 2 assessment?		
▪ An <i>E. coli</i> MCL violation.		
▪ A second Level 1 trigger within a rolling 12-month period.		
▪ For systems on approved reduced annual monitoring, a Level 1 treatment technique trigger in two consecutive years.		
If you answered yes to any of the items in “F” above, take the following action(s):		
▪ Check with your drinking water primacy agency to determine who can conduct a Level 2 assessment and which forms to use.		
▪ Conduct the Level 2 assessment, correct all sanitary defects found and submit form to your drinking water primacy agency within 30 days of learning of the trigger.		
G. Do you have a treatment technique violation?		
▪ Failure to conduct a required assessment within the required time period.		
▪ Failure to perform corrective actions within the required timeframe.		
▪ <u>Seasonal system</u> : Failure to complete a primacy agency-approved start-up procedure.		
If you answered yes to any of the items in “G” above, take the following action(s):		

ITEMS TO CHECK	YES	NO
Report the violation to your drinking water primacy agency no later than the end of the next business day after you learn of the violation.		
Notify the public by issuing a Tier 2 public notification as soon as practical but no later than 30 days after learning of the violation.		
H. Do you have a monitoring violation?		
- Failure to take all required routine and additional routine samples. <i>E. coli</i> not analyzed following a total coliform-positive routine sample.		
If you answered yes to any of the items in “H” above, take the following action(s):		
- Report the violation to your drinking water primacy agency within 10 days of learning the violation. - Notify the public by issuing a Tier 3 public notification within a year of learning of the violation.		
I. Do you have a reporting violation?		
- Failure to submit the monitoring report at the end of the monitoring period after system properly conducts monitoring. - Failure to submit the assessment form within required timeframe after system properly conducts an assessment. - Failure to notify your drinking water primacy agency of an <i>E. coli</i>-positive sample within the required timeframe. - Failure of a seasonal system to certify to the drinking water primacy agency that they have completed the start-up procedure before serving water to the public.		
If you answered yes to any of the items in “I” above, take the following action(s):		
Notify the public by issuing a Tier 3 public notification within a year of learning of the violation.		
J. If you are a <u>non-community water system</u> (including seasonal systems) on a <u>quarterly monitoring schedule</u>, did any of the events occur?		
- A Level 2 assessment or two Level 1 assessments are triggered in a rolling 12-month period. - An <i>E. coli</i> MCL violation. - A coliform treatment technique violation. - Two monitoring violations in a rolling 12-month period. - One monitoring violation and one Level 1 assessment in a rolling 12-month period.		
If you answered yes to any of the items in “J” above, take the following action(s):		
Begin monthly monitoring the month following the trigger event(s).		
K. If you are a <u>non-community water system</u> (including seasonal systems) on an <u>annual monitoring schedule</u>, did any of the following events occur?		
- Level 2 assessment or two Level 1 assessments are triggered in a rolling 12-month period. - An <i>E. coli</i> MCL violation. - A coliform treatment technique violation.		

ITEMS TO CHECK	YES	NO
If you answered yes to any of the items in “K” above, take the following action(s):		
▪ Begin monthly monitoring the month following the trigger event(s).		
L. If you are a <u>non-community water system</u> (including seasonal systems) on an <u>annual monitoring schedule</u>, did the following event occur?		
▪ A monitoring violation.		
If you answered yes to any of the items in “L” above, take the following action(s):		
▪ Begin quarterly monitoring the calendar quarter following the trigger event(s).		
M. If you are a <u>community water system</u> on a <u>quarterly monitoring schedule</u>, did any of the following events occur?		
▪ Loss of certified operator.		
▪ A Level 2 assessment or two Level 1 assessments triggered in a rolling 12-month period.		
▪ An <i>E. coli</i> MCL violation.		
▪ A coliform treatment technique violation.		
▪ Two monitoring violations in a rolling 12-month period.		
If you answered yes to any of the items in “M” above, take the following action(s):		
▪ Begin monthly monitoring the month following the trigger event(s).		