



Overview & FAQs: Revised Total Coliform Rule Seasonal System Requirements



In 2013, the Environmental Protection Agency published the Revised Total Coliform Rule. On April 1, 2016 the Revised Total Coliform Rule, in the *Colorado Primary Drinking Water Regulations*, (Regulation 11), will become effective in Colorado. The rule was revised to provide greater public health protection by requiring system assessments and the corresponding corrective action and applies to all of Colorado's drinking water systems.

The rule has many modified and new requirements for all seasonal drinking water systems, including:

- Revised monitoring plan requirements
- Revised routine and repeat total coliform sampling requirements
- Revised temporary routine sampling requirements
- New seasonal start-up procedures
- New level 1 and level 2 assessments

The revised and new requirements were included in the rule for seasonal systems because the operational procedures (e.g., shutdown and start-up) may present additional opportunities for contamination to enter or spread throughout the distribution system.

This document provides answers to the most commonly asked questions the department has received from seasonal systems.

What is the definition of a seasonal system?

A seasonal system is defined as a non-community water system that is not operated as a public water system on a year-round basis. This is regardless if your system remains pressurized or is non-pressurized. Your monitoring schedule will indicate if the department has identified you as a seasonal system, based on your population and operating period.

My system should not be identified as a seasonal system. What I should I do?

If your water system serves at least 25 people year-round and your system should not be identified as a seasonal system, please fill out and submit the "Inventory Update Form" which is available on-line at <https://www.colorado.gov/cdphe/monitoringplans>.

What happens if I never depressurize the distribution system?

Regardless if your seasonal system remains pressurized, you still must comply with all the revised rule's requirements.

For example, your system is a school that serves 125 students September through May. Five staff members work at the school June through August. The distribution system is never depressurized (i.e., the distribution system is still pressurized and serving water). Are you exempt from the seasonal start-up procedures?

No. You are still required to complete the department-approved procedures and certify that the start-up procedures were completed before supplying water to the public each season.



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I don't think I'm the administrative contact or operator for a seasonal system. How can I find out why I was contacted by the department?

The department recently emailed out the revised rule requirements to the administrative contacts, treatment operators, and distribution system operators at seasonal systems. As a result, the department received numerous requests regarding which seasonal systems they were listed for. If you should not be the identified administrative or operator contact for a specific system, please fill out the "Contact Update form" which is available on-line at <https://www.colorado.gov/cdphe/monitoringplans>.



If I want to use my own start-up procedures do I have to submit that to the department for review and approval? If so, who do I submit them to?

You must either:

- 1) use the department-approved start procedures included in the department's Revised Total Coliform Rule Start-Up Procedures for Seasonal Systems Handbook. If you use this option, you **do not** need to submit the start-up procedures to the department; or
- 2) submit your own start-up procedures to the department for review. The proposed start-up procedures must ensure that the distribution system has adequately been assessed and is free from potential contamination. The department's pre-approved start-up procedures can serve as a reference. If the department determines that the proposed plan requires revision prior to approval, the department will notify you in writing. Once department approval is issued, you must keep a copy of the approved start-up procedures onsite.

Please note that regardless of which option you select, you still are required to submit the certification that your start-up procedures were completed

I already started up my system before the April 1, 2016 effective date? What do I do now?

The revised rule is effective April 1, 2016. If you start-up prior to the effective date, you do not need complete the seasonal start-up procedures. However, you must complete the start-up procedures when you start-up the system again (regardless if the distribution system remains pressurized). After the April 1, 2016 effective date, you must always complete the start-up procedures before supplying water to the public each season.

For example, your system is a school that operates September through May. Since you started in September, prior to the April 1, 2016 effective date, you do not have to complete the start-up procedures in April 2016. In June, your system is off-season until you start serving the students again in September. Therefore, you must complete the start-up procedures in August



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2016, prior to serving water and continue to do so before supplying water to the public each season.

Where can I find the department's start-up procedures? Are they finalized?

The department's approved start-up procedures are available online <https://www.colorado.gov/pacific/cdphe/gwr>.

When do I have to certify that I completed the start-up procedures?

You must certify that you completed the department-approved start-up procedures no later than the 10th of the month following the month that you began supplying water to the public each season. The department's *Revised Total Coliform Rule Start-Up Procedures for Seasonal Systems Handbook* contains a certification form for your use and is available online at <https://www.colorado.gov/pacific/cdphe/gwr>.

Do I have to resubmit my total coliform sample siting plan?

It depends. The revised rule requires that **all** public water systems must have a sample siting plan that contains routine and repeat sampling locations that are representative of water quality in the distribution system. Regarding repeat monitoring locations, public water systems have the following three options:

1. Collect the three required repeat samples at the following locations:
 - a. original total coliform positive site
 - b. within five service connections upstream of the original site
 - c. within five service connects downstream of the original site
2. Identify alternative fixed repeat sampling sites. The revised sample siting plan must be submitted to the department.
3. Develop criteria for selecting repeat samples on a situational basis in a Standard Operating Procedure that is included in the sample siting plan. The revised sample siting plan must be submitted to the department.

Please note that you only need to submit your sample siting plan to the department if you decide to revise your existing sampling siting plan.

I am a seasonal system. Are my total coliform monitoring requirements changing?

Yes. All seasonal water systems will be required to collect monthly total coliform samples. The only systems that may continue to qualify for quarterly bacteriological monitoring are water systems that meet all of the listed requirements:

- The system is a non-community groundwater system that serves less than 1,000 people



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- The system does not meet the definition of a seasonal system.
- The system does not have a disinfection waiver.
- The system is not a water hauler.
- The system is not a hand-pump system.

Any changes in a public water system's monitoring will be reflected on the water system's monitoring schedule starting April 1, 2016. Monitoring schedules can be accessed at www.wqcdcompliance.com/schedules.

How many repeat samples to I have to take after a total coliform positive sample?

Regardless of population served, all public water systems are now required to collect three repeat bacteriological samples. Additionally, seasonal systems on monthly monitoring are no longer required to collect "temporary routine" bacteriological samples the following month after a total coliform-positive sample result.

When do I have to do a level 1 assessment?

A level 1 assessment is required if a system:

- collects greater than or equal to (\geq) 40 bacteriological samples a month and more than 5.0 percent (%) of the samples collected for the month are total coliform-positive.
- collects less than ($<$) 40 samples a month and more than one sample is total coliform-positive.
- fails to collect all of the required repeat samples after any single total coliform-positive sample result.

The level 1 assessment is due no later than 30 days of learning of the treatment technique trigger. A level 1 assessment form and its corresponding certification are provided on the department's website at <https://www.colorado.gov/cdphe/gwr>.

When do have to do a level 2 assessment?

Level 2 assessments are required if a water system exceeds the drinking water *E. coli* maximum contaminant level or if a water system has triggered two level 1 assessments within 12 consecutive months. Level 2 assessments must be completed no later than 30 days after learning of the triggered exceedance. All level 2 assessments will be conducted by the department.

Where can I submit my revised sample siting plan, proposed alternative start-up procedures, sampling data, or seasonal start-up procedures certification?

You can submit files using one of the three following options:



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- 1) Use the department's Drinking Water Portal (**Preferred**). The portal is an easy-to-use, online way for water systems and laboratories to submit drinking water compliance data, reports and other information. The portal is located at <http://wqcdcompliance.com/login> and requires first-time users to create an account.
- 2) By mail at:

Colorado Department of Public Health and Environment
ATTN: Leticia Bisgard
Water Quality Control Division / WQCD-B2-CAS
4300 Cherry Creek Drive South
Denver, CO 80246-1530
- 3) By fax at (303) 758-1398 with attention to Leticia Bisgard

Learn more about the Revised Total Coliform Rule

- [EPA fact sheet on the Revised Total Coliform Rule](#)
- [Revised Total Coliform Rule Start-Up Procedures for Seasonal Systems Handbook](#)
- [CDPHE's Level 1 Assessment form](#)
- [CDPHE's list of laboratories certified to test for total coliform](#)
- [Department's Aquatalk newsletter](#): The department has posted several articles throughout the last two years on the upcoming rule requirements.
- [Stakeholder related information for the revised rule.](#)

Additional Questions?

If this document did not address your questions or concerns, please contact Nicole Graziano at nicole.graziano@state.co.us or (303) 692-3258.