

Total Coliform Rule California Implementation

California Approach

- How Are Sample Sites Selected.
- Timing and Frequency of Samples.
- Number of Samples.
- Follow-up to Positive Samples.
- Public Notification.
- How Best to Achieve Compliance.

California Approach

- How Are Sample Sites Selected?

Sanitary Survey Information.

Number of sources feeding system.

- Wells, and/or Surface Water Plants.
- Storage tanks and Pressure Zones.
 - Number and location.
- Population centers.
- Complexity of distribution system.

- Monitoring May Rotate from Site to Site

California Approach

- Timing and Frequency of Samples?
 - Frequency depends on.
- Sanitary Survey Findings.
 - Service Connections/Population served.
 - Frequency of changes to system facilities.
 - Cross-connection threats.
 - System operational conditions.
 - Loss of pressure.
 - Changes in source.
 - Investigations of complaints and tampering.
- Quarterly, Monthly, Weekly, Several days per week, Weekend if high use period.

California Approach

- Number of Samples
 - Service Connections/Population
 - Physical condition of system (new vs. old)
 - Size of system.
 - Cross-connection threats.
 - System operational conditions (special samples).
 - Loss of pressure.
 - Changes in source.
 - Customer complaints.
- More than minimum required if needed.

California Approach

- Follow-up to Positive Findings
- All positive require 3/4 follow-up samples. Three samples for LWS and 4th is nearest Source for SWS)
- Phone Call to Operator and possible system inspection undertaken to assess potential problem.
- 5 follow up samples the following month for small systems, waived if system inspection identified likely problem and problem is corrected.
- California Significant Rise Criteria. Call Us If any of the following:
 - Positive E Coli. or Fecal Coliform sample.
 - 2 positive total coliform samples in follow-up sample set.
 - Monthly MCL failure determined.

California Approach

■ Public Notification

- **Tier 1 Notice:** Issued when system dewateres, for Fecal and E Coli positive results or large # of positive Total Coliform
- **Tier 2 Notice:** “Routine Monthly MCL Failure”
- **Tier 3 Notice:** “Monitoring and Reporting Failures”. We allow use of Consumer Confidence Report (CCR) for notice.

California Approach

- We don't use TCR data as single tool to evaluate water quality problems when positive samples are identified.
- TCR data, System Sanitary Survey information and discussion of recent activities with system operator is the best approach available for evaluating system problems.

California Approach

- TCR Compliance Depends on System Operators.
- Competent system operation is the key to safe water and the ability to train and keep operators with good understanding of water quality issues best way to achieve this goal.
- Large water systems provide chlorination as means of assuring TCR compliance.