



John R. Kasich, Governor
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Seasonal Public Water Systems - Introduction to the Revised Total Coliform Rule

Dear public water system owner:

This letter is to notify you that your public water system is affected by the Revised Total Coliform Rule. The Revised Total Coliform Rule applies to all public water systems and includes the monitoring and response requirements for total coliform bacteria. Additional information is available on the Ohio EPA website at <http://epa.ohio.gov/ddagw/rtrc.aspx>.

The requirements outlined in this letter apply to seasonal public water systems with a ground water source (i.e., well). **This means your system must fall into one of the following categories:**

1. **Depressurized Seasonal System:** The entire water system is depressurized (all of the waterlines are drained) for a period of time each year.
2. **Partially-Depressurized Seasonal System:** The water system is partially-depressurized (some of the waterlines are drained) for a period of time each year.
3. **Fully-Pressurized Year-Round Seasonal System:** The entire water system stays fully-pressurized (none of the waterlines are drained), but no one has access to the water for a period of time during the year (must be more than 90 consecutive days).

Please contact the local Ohio EPA District Office if you are unsure what type of public water system you operate.

As a seasonal public water system, the Revised Total Coliform Rule will affect your system in the following ways:

- **Depressurized and Partially-Depressurized Seasonal Systems:**
 - **Must complete the Seasonal Start-Up Procedure before they begin serving water to the public each year.** The steps in the start-up procedure include:
 - **Completing the “[Seasonal Public Water System Start-Up Requirements and Checklist](#).”**
 - The checklist includes **collecting at least one total coliform sample prior to opening**. This is referred to as your “start-up” sample and is required in addition to the routine total coliform samples that you collect after you open.
 - **If the start-up total coliform sample is safe (negative/absent):**
 - **Complete the “[Seasonal Start-Up Certification Form](#).”** This form must be received by the Ohio EPA District Office before you begin serving water to the public.
 - **If the start-up total coliform sample is unsafe (positive/present):**
 - Contact Ohio EPA for assistance with the required response actions.
- **Fully-Pressurized Year-Round Seasonal Systems:**
 - **Are required to complete the “[Simplified Start-Up Checklist for Fully-Pressurized Seasonal Systems](#)” after they are notified to do so by Ohio EPA.** If you have not been notified of this requirement already, the notification will generally be included in the letter following your next site visit from Ohio EPA.

- The simplified start-up procedure includes completing the “[Simplified Start-Up Checklist for Fully-Pressurized Seasonal Systems](#)” and keeping it on file for at least 5 years. You do not need to complete the “Seasonal Start-Up Certification Form” or notify Ohio EPA in any way. Ohio EPA will review the checklists during the next routine inspection of your water system.
- **All systems must have an up-to-date total coliform sample siting plan.** The “[Seasonal Total Coliform Sample Siting Plan Template](#)” is available on our website. You are required to collect total coliform samples from the locations listed in your Sample Siting Plan.
- In the past, you collected a routine total coliform sample every quarter when water was available. **Under the Revised Total Coliform Rule, your routine sampling schedule may change as follows:**
 1. **Depressurized Seasonal System** = once/month (during operating season)
 2. **Partially-Depressurized Seasonal System** = once/month (during primary operating season), and once/quarter (during off-season)
 3. **Fully-Pressurized Year-Round Seasonal System** = once/quarter (during operating season)

THE CHANGE IN YOUR SAMPLING FREQUENCY WILL BEGIN AFTER AN OHIO EPA INSPECTOR MEETS WITH YOU ON-SITE TO PERFORM A DETAILED MONITORING EVALUATION DURING A SANITARY SURVEY OR LIMITED SCOPE SITE VISIT. You are to continue with the current sampling frequency provided in your monitoring schedule until the evaluation takes place.

- If one or more of your routine total coliform samples tests unsafe (positive/present) for total coliform bacteria, then you must collect:
 - **Three repeat samples** for each unsafe (positive/present) routine sample within 24 hours of being notified of the unsafe result.
 - **A source water sample if you have multiple wells or substantial treatment.** This sample must also be collected within 24 hours of notification. See Section 2c of the “[Seasonal Total Coliform Sample Siting Plan Template](#)” to determine if this requirement applies to your system.
 - **Three routine samples the following month.**
 - This requirement only applies if the routine sample was collected during a quarterly monitoring period. For example, if you are required to collect 1 sample during the first quarter (Jan-Mar), and that sample was positive, then you would be required to collect 3 routine samples the following month.
 - This requirement does not apply if the routine sample was collected during a monthly monitoring period (e.g., the monthly routine sample for June was positive).
- If any routine or repeat total coliform sample is unsafe (positive/present), the laboratory must also analyze that sample for E. coli.
- If any repeat sample result is positive for total coliform or E. coli, the Revised Total Coliform Rule requires a “find & fix” approach. This is accomplished by performing an assessment. There are two types, a Level 1 Assessment and a Level 2 Assessment. More information about the assessments is provided in the fact sheet: “[The Revised Total Coliform Rule: Seasonal Public Water Systems](#).”
- If you are on a quarterly monitoring schedule, your sampling frequency may increase to monthly if certain conditions exist, as explained in the [fact sheet](#).

All forms and paperwork are available online at <http://epa.ohio.gov/ddagw/rtrcr.aspx>. Please contact the local Ohio EPA District Office if you need assistance.