



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

2020 JAN 10 AM 10:58

JAN 10 2020

EPA REGION VIII
HEARING CLERK

Ref: 8ENF-W-SD

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Baker, Board President
Etna Water and Sewer District
P.O. Box 5031
Etna, Wyoming 83118

Re: Administrative Order issued to Etna Water and Sewer District, PWS ID #WY5600157,
Docket No. **SDWA-08-2020-0015**

Dear Mr. Baker:

Enclosed is an Administrative Order (Order) issued by the United States Environmental Protection Agency under the authority of section 1414(g) of the Safe Drinking Water Act, 42 U.S.C. § 300g-3(g). Among other things, the Order alleges that Etna Water and District (District), as owner and/operator of Etna Water and Sewer District Public Water System (System), has violated the EPA's drinking water regulations at 40 C.F.R. part 141 (Part 141). The EPA is issuing this Order because our previous compliance assurance efforts have not been effective in returning the System to compliance with Part 141.

The Order is effective upon the date received. Please review the Order and within 10 business days provide the EPA with any pertinent information you believe the EPA may not have (*e.g.*, any monitoring that may have been done but not submitted, any updates to the number of service connections and/or individuals served). If the EPA does not hear from the District, the EPA will assume this information is correct. If the District complies with the Order, the EPA may close the Order without further action.

Failure to comply with the Order may trigger immediate action by the EPA, including a complaint seeking administrative penalties. The complaint may lead to assessment of civil penalties of up to \$57,317 (as adjusted for inflation) per day of violation, a federal court injunction ordering compliance, or both.

The Small Business Regulatory Enforcement and Fairness Act (SBREFA) may apply to this situation. Enclosed is a small business information sheet, outlining compliance assistance resources available to small businesses and small entities, in case these are relevant. SBREFA does not eliminate the responsibility to comply with the Order or Part 141. Also enclosed are several templates and fact sheets to assist you in addressing the outstanding violations.

If you have any questions or to request an informal conference with the EPA, please contact Christina Carballal via email at Carballal-Broome.Christina@epa.gov, or by phone at (800) 227-8917, extension 6046, or (303) 312- 6046. Any questions from the Agency's attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at Bearley.Mia@epa.gov or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

We urge your prompt attention to this matter.

Sincerely,



Colleen Rathbone, Chief
Water Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosures

cc: WY DEQ/DOH (via email)
Lincoln County Commissioners (rking@lccwy.org)
Melissa Haniewicz, EPA Regional Hearing Clerk
Bob Choma, Operator (choma@silverstar.com)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

IN THE MATTER OF:)
)
)
Etna Water and Sewer District)
PWS#WY5600157)
)
Respondent)

Docket No. **SDWA-08-2020-0015** EU

ADMINISTRATIVE ORDER

2020 JAN 10 AM 10:58

EPA REGION VIII
READING CI FRK

1. This Order is issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by section 1414(g) of the Safe Drinking Water Act (Act), 42 U.S.C. § 300g-3(g), as properly delegated to the undersigned official.
2. Etna Water and Sewer District (Respondent) is a public body created by or pursuant to Wyoming law that owns and operates the Etna Water and Sewer Public Water System (System), which provides piped water to the public in Lincoln County, Wyoming, for human consumption.
3. The System is supplied by a groundwater source accessed via one well and the Lee Creek Spring. The water could be chlorinated at the well and storage tanks but is currently inactive.
4. The System has approximately 68 service connections and regularly serves an average of approximately 135 individuals year-round. Therefore, the System is a “public water system” as defined in section 1401(4) of the Act, 42 U.S.C. § 300f(4), and 40 C.F.R. § 141.2. The System is also a “community water system” as defined in 40 C.F.R. § 141.2.
5. Respondent is subject to the Act and 40 C.F.R. part 141. The Drinking Water Regulation is an “applicable requirement” as defined in section 1414(i) of the Act, 42 U.S.C. § 300g-3(i).
6. The Drinking Water Regulation includes monitoring requirements. The EPA has sent Respondent annual notifications of the specific monitoring requirements that apply to the System.

VIOLATIONS

7. For each calendar year, Respondent is required, no later than July 1st of the following year, to prepare and distribute a Consumer Confidence Report (CCR) to the EPA and the System’s customers. Within three months thereafter, Respondent is required to certify to the EPA that it has distributed the CCR to the System’s customers. 40 C.F.R. §§ 141.151-141.155. Respondent failed to prepare and distribute an annual CCR for calendar 2015 to the System’s customers and to the EPA and failed to provide a certification to the EPA for the 2015 year within the required deadlines. Therefore, Respondent violated these requirements.
8. Respondent is required to develop a written total coliform sample siting plan (SSP) that identifies sampling sites and a sample collection schedule that are representative of water throughout the distribution system by March 31, 2016, and submit it to the EPA for review. 40 C.F.R. § 141.853(a)(1). A January 29, 2018, notice of violation letter reminded the System that the previously reviewed SSP was incomplete and required a revised submittal by August 31, 2017. Respondent failed to submit a revised SSP to the EPA and therefore, violated this requirement.

9. Respondent is required to deliver a consumer notice of individual tap monitoring results for lead and copper to the persons served at each sampled site within 30 days of receipt of the data and in accordance with 40 C.F.R. § 141.85(d). Within 90 calendar days following the end of each monitoring period, Respondent is required to submit to the EPA a sample copy of the consumer notification along with a certification that the notification has been distributed, in accordance with 40 C.F.R. § 141.90(f)(3). Respondent failed to deliver a consumer notice to the persons served at each sampled site and failed to submit a copy of the consumer notice to the EPA for the monitoring period of June 1 to September 30, 2018, and therefore, violated this requirement.

10. Respondent is required to notify the public of certain violations of Part 141 and, within 10 calendar days after completing public notice, provide a copy of the public notice and certification to the EPA. 40 C.F.R. §§ 141.31(d) and 141.201-141.211. The violations identified in paragraph 7, above, are classified as Tier 3 violations, requiring public notice within 1 year, according to 40 C.F.R. § 141.204. Respondent failed to notify the public of the violations cited in paragraph 7 and failed to submit a copy to the EPA and therefore, violated this requirement.

11. Respondent is required to report any failure to comply with Part 141 to the EPA within 48 hours (except where Part 141 specifies a different time period). 40 C.F.R. § 141.31(b). Respondent failed to report the violations cited in paragraphs 7, 8, and, 9 above, to the EPA and therefore, violated this requirement.

ORDER

Respondent is ordered to perform the following actions upon Respondent's receipt of this Order (unless a different deadline is specified below):

12. Respondent is ordered to comply with all provisions of the Act and Part 141, including but not limited to each requirement cited above.

13. Within 30 calendar days after receipt of this Order, Respondent shall (1) prepare an annual CCR, to include all information required by 40 C.F.R. §§ 141.153 and 154, for the System for calendar 2015 and 2016 and distribute each CCR to the System's customers and the EPA and (2) certify to the EPA that each CCR has been distributed to the System's customers and that its information is correct and consistent with monitoring data previously provided to the EPA. Thereafter, Respondent shall prepare and distribute annual CCRs and provide certifications as required by 40 C.F.R. §§ 141.151-141.155.

14. Within 30 calendar days of receipt of this Order, Respondent shall develop a revised written total coliform sample siting plan and submit it to the EPA for review. The plan must identify sampling sites (both routine and repeat) and a sample collection schedule that is representative of water throughout the distribution system, as required by 40 C.F.R. § 141.853(a)(1). A template, with requirements and instructions, can be found at <https://www.epa.gov/region8-waterops/revised-total-coliform-rule-sample-siting-plan>.

15. Within 90 calendar days after receipt of this Order, Respondent shall deliver a consumer notice of individual tap monitoring results to the persons served at each sampled site, in accordance with 40 C.F.R. § 141.85(d). Within 90 calendar days following the end of each monitoring period, Respondent shall submit to the EPA a sample copy of the consumer notification along with a certification that the notification has been distributed, in accordance with 40 C.F.R. § 141.90(f)(3).

16. Within 30 calendar days after receipt of this Order, Respondent shall notify the public of the violations cited in paragraphs 7 and 9 above. Templates and instructions are available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#pn>. Thereafter, following any future violation of Part 141, Respondent shall comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 calendar days after providing public notice, Respondent shall submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d).

17. For any future violation of the Part 141 for which this Order does not specify a reporting period, Respondent shall report the violation to the EPA within 48 hours of the violation occurring, as required by 40 C.F.R. § 141.31(b). However, if the Drinking Water Regulation specifies a different time period for reporting the particular violation, Respondent shall report the violation to the EPA within that different period.

18. If the population or number of connections served by the System falls below 25 individuals or 15 connections, Respondent shall notify the EPA in writing within 10 days by submitting a completed basic information form. The form is available at: <https://www.epa.gov/region8-waterops/reporting-forms-and-instructions-reporting-forms#new>.

19. If Respondent (a) leases or sells the System to another person or entity, or (b) contracts with or hires any other person or entity to operate the System, Respondent shall, within 10 calendar days, provide a copy of this Order to the lessee, purchaser, or contractor and notify the EPA in writing of the change. In either of these circumstances, Respondent shall remain obligated to comply with this Order.

20. Respondent shall send all reporting and notifications required by this Order to the EPA at:

Email: R8DWU@epa.gov, and carballal-broome.christina@epa.gov

GENERAL PROVISIONS

21. This Order shall be binding on Respondent, its assigns and heirs, and any person (e.g., employee, contractor, or other agent) acting in concert with Respondent.

22. This Order shall not constitute a waiver, suspension, or modification of any requirement of the Act or the Part 141. Issuance of this Order is not an election by the EPA to forgo any civil or criminal action.

23. Violation of any part of this Order, the Act, or the Drinking Water Regulation may subject Respondent to a civil penalty of up to \$57,317 (as adjusted for inflation) per day of violation, a court injunction ordering compliance, or both. 42 U.S.C. § 300g-3; 40 C.F.R. part 19; 84 Fed. Reg. at 2059 (February 6, 2019).

24. Respondent may seek federal judicial review of this Order pursuant to section 1448(a) of the Act, 42 U.S.C. § 300j-7(a).

Issued: January 10, 2020.


Colleen Rathbone, Chief
Water Enforcement Branch
Enforcement and Compliance Assurance Division



EPA Region 8 Drinking Water Unit - Tips for WY and Tribal Systems How to Stay in Compliance with Monitoring Requirements

Check your Monitoring Schedule

- Monitoring and Reporting Requirements (Schedules) are emailed to you in February of each year. This schedule notes all contaminants your water system must monitor for, along with the required number of samples, sampling point location(s), frequency and timeframe.
- For more detailed info on your Monitoring Schedule, please refer to “*What You Need to Do Next with Monitoring Requirements*” which can be found at: <https://www.epa.gov/region8-waterops/quick-guide-drinking-water-monitoring-requirements-wyoming-and-tribal-lands-epa>
- Suggestions: Post your Monitoring Schedule on your bulletin board. Note when you must sample on your desk or wall calendar. Use a scheduler on your computer (like Outlook) to identify sampling dates and set reminders.
- If you misplace your Monitoring Schedule, a copy can be found on Drinking Water Watch (DWW) or call EPA for a replacement copy.
- **Work with your Certified Lab** - Once you receive your Monitoring Schedule, share it with your lab(s).
- Schedule what bottles you will need for the sampling required for the year and ask for extra Total Coliform Rule (TCR) sample bottles just in case you have a total coliform (TC) positive and need to take repeats or source samples for the Ground Water Rule. It saves time!
- Check to see if your lab will copy EPA when they email you your results. This will save you a step! But ultimately, you are responsible for making sure that EPA receives your sample results.
- **Check your email for messages from EPA.** Every month EPA sends out a reminder to the administrative contact (and others who request to be opted-in) of what chemical (including radiological) samples remain to be collected for the monitoring period.
- Use DWW to print out your chemical sample collection form for the pending requirements. It will contain information to help your lab understand what to test your samples for.

When to Sample and When to Report Results to EPA - ALWAYS sample as early in the month or monitoring period as you can – on a Monday if possible! This way, if a sample is lost or exceeds a holding time, you will still have time to collect another sample before the weekend or end of the month. This is a super easy way to avoid a violation.

- If the lab is not copying EPA on your sample results, send them in to EPA as soon as you receive them. This way you can avoid getting a violation for Failure to Monitor. **Tip:** TCR results are due by the 10th of the month following the month you sampled. For all other samples, send results to EPA as soon as you receive them from the lab.
- Samples results can be emailed to: r8dwu@epa.gov or faxed to: 1-877-876-9101

Where to Sample – Take your samples according to your Monitoring Schedule during the correct time period and at the correct location(s). Some samples must be collected at the entry point while others must be collected in the distribution system. Use your approved sampling/monitoring plans for distribution system samples!

Surface Water Treatment Rule – For compliance guidance, please refer to the EPA Region 8 SWTR Fact Sheet located at: <https://www.epa.gov/region8-waterops/swtr-fact-sheet-epa-region-8-may-2018>

Total Coliform Rule

- Anytime you have a *E.coli* (EC+) sample **you must call EPA IMMEDIATELY at 1-800-227-8917** and ask to speak with the RTRC Manager. Then take repeat TCR samples, as well as Ground Water Rule source sample(s) (if applicable).
- If you have a TC Positive but an E. Coli Negative, follow the 5 steps outlined in “*Follow-up to an Unsafe/Total Coliform Positive Sample Tech Tip*”, which can be found at: <https://www.epa.gov/region8-waterops/addressing-total-coliform-positive-or-ecoli-positive-sample-results-epa-region-8>
- Avoid sampling at new faucets or newly repaired faucets, leaky faucets, outdoor faucets or those faucets connected to softeners, hot water heaters, or pressure tanks; setting down the bottle lid or exposing the inside of the lid or bottle to anything other than the sample water (do not rinse or remove powder); and rushing your sample collection. The TCR samples must be taken at specified locations throughout the distribution system as designated by your sampling plans.

Disinfection Byproducts Rule (DBPR)

- Sample according to your approved monitoring plan – you can also find what month(s) you are required to monitor and locations on your Monitoring Schedule.
- Submit your sample results and your LRAA forms (applicable to quarterly sampling) as a package as soon as you receive the results from your lab.
- Complete and submit the TTHM HAA5 OEL Calculator, which can be found on Drinking Water Online at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#dbpr2> , together with your compliance reports if the TTHM or HAA5 MCL is exceeded during any quarter.

Nitrates – This is an acute contaminant. If your nitrate sample result is over 10 mg/L you must take a confirmation sample within 24 hours and call EPA IMMEDIATELY at 303-312-6791.

Lead and Copper Rule

- Be sure to check your Monitoring Schedule, as lead and copper samples must be collected during certain months. Also, be sure to follow your lead and copper sample siting plan when collecting samples. You must collect samples from approved locations. If you don't have to sample this year, your Monitoring Schedule will tell you that.
- **Always** collect a first-draw sample from a tap where the water has been standing in the pipes for at least 6 hours. Avoid sample locations that have been vacant for weeks or months. The goal is to sample at homes and taps in these homes that are routinely used. Always follow your monitoring plan.

Other Rules - Check your sample results as soon as you receive them from the lab. If you see any sample has exceeded an MCL or *E. coli* positive, contact EPA immediately.

Drinking Water Online - This is where you can find the link to DWW and general info, including: emergencies, what to do if you lose pressure in your system, sanitary survey info, certified lab info, sampling and treatment techniques, reporting forms and instructions, rules and guidance and much more: Be sure to check this very helpful website: <https://www.epa.gov/region8-waterops>

Drinking Water Watch - This online system allows you view data we maintain about your water system(s). The information includes the following:

- size and type of population served
- contact information
- water system facilities, such as wells, intakes, treatment plant, storage tanks, and distribution
- treatment used
- monitoring schedules
- sampling results reported to EPA
- violations
- plus, even more...

The Public Access Version of DWW (DWWPUB) allows anyone who is interested to view much of the available information for each regulated Public Water System (PWS) in Wyoming and within EPA R8 Tribal Lands, without the need to register or remember passwords. The Public Access Version of DWW can be found at: <https://sdwiser8.epa.gov/Region8DWWPUB/default.jsp>

Emergencies (After Hours) - If you need to report an emergency (flooding or loss of your water source, contamination in your drinking water, loss of pressure in the distribution system, or anything else that could require immediate public notice), after hours call the Region 8 Emergency Hotline at 303-293-1788. Inform the operator that you are a drinking water system in EPA Region 8.

Consumer Notice of Lead Tap Water Results

Public Water System Name: _____ Public Water System ID: _____

Sample Location: _____ Date Collected: _____

Dear _____,

We would like to thank you for your participation in the lead tap monitoring program. Below is the lead result for the sample location listed above. Additional general information concerning lead in drinking water follows. For more information on reducing lead exposure around your home and the health effects of lead, visit EPA's Web site at www.epa.gov/lead, call the National Lead Information Center at 800-424-LEAD, or contact your health care provider.

If you need more information concerning this result, please call the _____ community water supply at _____ and ask for _____.

ONLY the statement that is checked below is applicable to your sample location.

Lead was NOT DETECTED at this sample location.

Lead was detected at _____ mg/L. This result is BELOW the lead action level of 0.015 mg/L.

Lead was detected at _____ mg/L. This result is ABOVE the lead action level of 0.015 mg/L.

What Does This Mean?

Under the authority of the Safe Drinking Water Act, EPA set the action level for lead in drinking water at 0.015 mg/L. This means utilities must ensure that water from the customer's tap does not exceed this level in at least 90 percent of the homes sampled (90th percentile value). The action level is the concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow. If water from the tap does exceed this limit, then the utility must take certain steps to correct the problem. Because lead may pose serious health risks, the EPA set a Maximum Contaminant Level Goal (MCLG) of zero for lead. The MCLG is the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

If detected, your lead level may be due to conditions unique to your home, such as the presence of lead solder or brass faucets, fittings and valves that may contain lead. Our system works to keep the corrosivity of our water as low as possible (corrosive water can cause lead to leach from plumbing materials that contain lead) and there are actions you can take to reduce exposure. We recommend that you to take the steps below to reduce your exposure to lead in drinking water.

Should the lead 90th percentile for this water supply exceed the lead action level, we would take a number of steps to correct the problem. Such steps include; monitor our source water for lead content, initiate controls to reduce the corrosivity of our water, and initiate lead service line replacement if needed.

What Are The Health Effects of Lead?

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys, and can interfere with the production of red blood cells that carry oxygen to all parts of your body. The greatest risk of lead exposure is to infants, young children, and pregnant women. Scientists have linked the effects of lead on the brain with lowered IQ in children. Adults with kidney problems and high blood pressure can be affected by low levels of lead more than healthy adults. Lead is stored in the bones, and it can be released later in life. During pregnancy, the child receives lead from the mother's bones, which may affect brain development.

What Are The Sources of Lead?

The primary sources of lead exposure for most children are deteriorating lead-based paint, lead-contaminated dust, and lead-contaminated residential soil. Exposure to lead is a significant health concern, especially for young children and infants whose growing bodies tend to absorb more lead than the average adult. Lead is rarely found in source water, but enters tap water through corrosion of plumbing materials. Homes built before 1988 are more likely to have lead pipes, fixtures and solder.

What Can I Do To Reduce Exposure to Lead in Drinking Water?

If you are concerned about the lead levels at your location, there are several things you can do:

- ***Run your water to flush out lead.*** If water hasn't been used for several hours, run water for 15-30 seconds or until it becomes cold or reaches a steady temperature before using it for drinking or cooking. This will help flush lead-containing water from the pipes.
- ***Use cold water for cooking and preparing baby formula.*** Do not cook with or drink water from the hot water tap; lead dissolves more easily into hot water. Do not use water from the hot water tap to make baby formula.
- ***Do not boil water to remove lead.*** Boiling water will not reduce lead.
- ***Look for alternative sources or treatment of water.***
- ***Test your water for lead.*** Call us at the number above to find out how to get your water tested for lead.

Identify if your plumbing fixtures contain lead. Brass faucets, fittings, and valves, including those advertised as "lead-free," may contribute lead to drinking water. The law currently allows pipes, fittings, and fixtures with up to .25 percent weighted average of lead to be identified as "lead-free."

Lead Consumer Notice Certification Form

This form is intended for use by public water systems in Wyoming and tribal lands in the following states: Colorado, Montana, North Dakota, South Dakota, Utah or Wyoming.

Please complete this Lead Consumer Notice Certification Form. Include one example of a completed Consumer Notice Form and send both pieces of documentation to: EPA Region 8, Lead/Copper Rule Manager, r8dwu@epa.gov, or mail to 1595 Wynkoop Street, Denver, CO 80202-1129 or fax to: Attention Lead/Copper Rule Manager, 1-877-876-9101.

PWS Name: _____ PWS No. _____
Contact Person: _____ Phone :(____) _____
Today's Date: _____

Monitoring period to which the notice applies (e.g., June – September 2016): _____

The last result for the period was received from the laboratory on: _____

All results were provided to consumers by (date): _____

The water system also certifies that the template contained the following information and was delivered within 30 days of receiving the test results from the laboratory to such persons:

- Individual tap results from lead tap water monitoring
- An explanation of the health effects of lead
- Steps that consumers can take to reduce exposure to lead in drinking water
- Contact information for your water utility
- The maximum contaminant level goals and action levels for lead, and the definitions of these two terms

DELIVERY METHOD

The result/information notice was distributed by the following method, check all that apply:

- By Direct Mail _____
- By Hand Delivery _____
- By Electronic mail _____
- Other (e.g. posting) _____

Signature of Owner, Administrative Contact, or Official Custodian

I, _____, hereby certify that the lead consumer notice has been provided to each person it serves at the specific sampling site from which the sample was tested.

Signature _____ Date _____

Title _____

EPA Region 8 Revised Total Coliform Rule

Sample Siting Plan Instructions

Why do I need to develop a Revised Total Coliform Rule (RTCR) Sample Siting Plan?

The purpose of this plan is to specify where in the distribution system Routine and Repeat bacteriological samples will be collected to ensure they are representative of the water quality in your system. The original Sample Siting Plan must be kept on-site for use by sampling personnel. Beginning April 1, 2016, under the RTCR, every water system will be required to collect bacteriological samples monthly.

The RTCR requires every public water system to develop an RTCR Sample Siting Plan prior to April 1, 2016. These plans are subject to review and revision by EPA. You must include the following elements in your plan:

1. A list of sampling locations: (See blank sample plan **chart** and example Addendum C.)
 - You will need to indicate the sites for Routine and Repeat bacteriological monitoring in your distribution system; and
 - Any source water sampling sites if subject to the Ground Water Rule.

2. A map of the distribution system showing locations of your Routine and Repeat sample sites and your source water, as described in the Sample Siting Plan. You can use a diagram, distribution system map, aerial photo, etc. Clearly indicate if there are multiple distribution systems and if those distribution systems are connected to each other. Note: You cannot use the schematic that indicates your nitrate sampling point. (See sample plan map examples Addendum B.)

Where to submit your plan:

Send a copy of your RTCR sample siting plan via mail, e-mail, or fax to:

EPA Region 8
Drinking Water Program 8WD-SDA
1595 Wynkoop Street
Denver, CO 80202
Attn: RTCR Rule Manager
Fax: (877) 876-9101
Email: R8DWU@epa.gov

How to choose a laboratory:

Not all laboratories have been approved and certified to analyze for all the required drinking water contaminants. You must send your samples to a laboratory that is certified for the specific samples that you are submitting. For a list of certified labs, visit the EPA Region 8 website:

<https://www.epa.gov/region8-waterops/general-sampling-information> and click the certified lab link.

Requirements

selecting sample sites and rotation:

layout of your distribution system and choose RTCR sample sites that will represent each area of the distribution system if sampling on a regular basis throughout an entire year or open season. Be sure to take into account non-permanent sources (seasonal or interim). If you have multiple distribution systems, you must be represented within your siting plan. If your water system has multiple (completely separated) distribution systems, you must have a separate siting plan for each. Within each separate distribution system for each month you are serving water to the public. If you serve more than 4,901 people (or more than 1.853(a)(2)1. samples per month) you cannot collect all the samples on the same day. They must be collected at regular intervals throughout the year.

Siting Plan may need to be updated periodically to account for system changes (such as population changes, new housing or commercial development, etc.), new sources, change in operating season, change in treatment, etc). The plan should be reviewed annually and must be available for public review and comment. Submit any revisions to the EPA regional office as soon as they occur.

Monitoring Requirement

Monitoring requirements specified in your monitoring and reporting requirements, most systems will be placed on the monitoring schedule seen in Attachment A of this document.

Charts in Addendum B as examples for formatting the Sample Siting Plan. The following must be included in the plan (a blank chart is provided):
C) Routine sampling location(s);
Repeat sampling locations (only used if your Routine sample is TC+);
Ground Water Rule (GWR) source sample location(s) for systems using groundwater sources. (Triggered GWR source sample(s) are required if your Routine sample result is TC+. You must sample every groundwater source in use at the time of the TC+ Routine sample.)

Monitoring

11, 2016, under the RTCR, systems must collect no fewer than **three** Repeat samples for each TC+ Routine sample. This requirement applies to all systems.

Repeat samples need to be taken within 24 hours of notification of a TC+ Routine sample. If you cannot make this timeframe, you must request an extension from the EPA Region 8 within 24 hours to request an extension;

Repeat sample is required to be taken from the same tap as the original TC+ sample;

Repeat sample must be taken at a tap within five service connections upstream of the original TC+ Routine sample, and one must be taken at a tap within five service connections downstream of the original TC+ Routine sample.

of your Routine sample locations. Can you take proper Repeat samples based on your current choices of Routine sampling locations? Will you need to reevaluate your Routine sites and choose another location. If you do not have a distribution system (i.e., have a

upstream and downstream locations may not exist. In this case, you must collect multiple samples at the original location to count as Repeat samples.

Follow this same format of choosing representative Routine and Repeat sample locations (as shown in Addendum B) but expand as necessary if your system is required to take more than one sample per month (see Example #2). Seasonal systems only have to sample during their operating season (see Example #2).

Submitting Samples to the Laboratory:

- In order for EPA to confirm the locations of your samples and the types of samples (Routine, Repeat or Special), EPA encourages you to submit additional details about the sampling locations of your RTCR samples to the lab. Along with the lab's chain of custody form, you can use the "Source Water Sampling-Triggered Source Monitoring Sample Collection and Reporting Form" found on the EPA Region 8 website at: <https://www.epa.gov/region8-waterops/revised-total-coliform-rule-lab-sampling-form>

E. coli Testing and E. coli MCL Compliance Determination

Any TC+ sample result must automatically be analyzed for *E. coli* (EC) by your lab. Any EC+ Repeat sample or any TC+ Repeat sample following an EC+ Routine sample constitutes an *E. coli* MCL violation. All *E. coli* MCL violations are situations that require you to contact EPA Region 8 immediately and distribute public notice including a boil water order to your customers.

Groundwater source sampling:

Triggered Source Water Monitoring Requirement

Your system will need to conduct triggered source water sampling if you use a groundwater source and have a TC+ Routine sample result. Review your Monitoring and Reporting Requirements sheet to verify if source water monitoring is necessary under these conditions. If you need to conduct this monitoring, keep the following in mind:

- Within 24-hours of notification that a *Routine* RTCR distribution system sample is TC+, you must collect a raw water sample from each groundwater source that was in use at that time for every Routine TC+ sample (e.g., if you have three Routine TC+ samples, you will need to collect three source samples from *each* groundwater source). This sample must be analyzed for *E. coli*.
- You are encouraged to report this data to the lab using the "Source Water Sampling-Triggered Source Monitoring Sample Collection and Reporting Form" found on our website at:
<https://www.epa.gov/region8-waterops/wyoming-and-tribal-triggered-groundwater-source-sampling-form>
- If you need further assistance on the Ground Water Rule and the required steps after a Routine TC+ sample, please consult:
<https://www.epa.gov/region8-waterops/epa-region-8-drinking-water-unit-tech-tips-follow-unsafetotal-coliform-positive>

If the system received EPA Region 8 approval to use a sampling site that represents more than one groundwater source, please indicate that on the sample collection and monitoring form mentioned above that is submitted with your samples.

ons on how to properly label your RTCR and GWR samples please see the “RTCR and GWR Sample Labeling Instructions” fo
bsite: <https://www.epa.gov/region8-waterops/rtcr-and-gwr-sample-labeling-instructions>

nt (chlorine) residual monitoring:

ect, your system may need to conduct residual disinfectant monitoring in the distribution system for the Disinfection By-Produ
urface Water Treatment Rule. Review your Monitoring and Reporting Requirements sheet to verify if disinfectant monitoring is
f you need to conduct this monitoring, keep the following in mind:

residual disinfectant must be measured at the same time and the same location as each total coliform bacteria sample.

measurements must be conducted in the field by a certified operator (or under the direction of the certified operator).

idual disinfectant measurements must be written on each total coliform sample slip when it is submitted to the laboratory.
your laboratory to forward this information to EPA along with the sample results.

on the disinfectant used in the distribution system, ensure you are measuring the proper disinfectant residual:

lorine is used, the disinfectant residual must be measured as free, total, or combined chlorine

loramines are used, the disinfectant residual must be measured as total chlorine

Addendum A: Required number of monthly Routine samples under the Revised Total Coliform Rule

Sampling requirements for all water systems*:

Population served/day	Routine Samples/Month	Population served/day	Routine Samples/Month
25-1,000	1	8501-12900	10
1001-2500	2	12901-17200	15
2501-3300	3	17201-21500	20
3301-4100	4	21501-25000	25
4101-4900	5	25001-33000	30
4901-5800	6	33001-41000	40
5801-6700	7	41001-50000	50
6701-7600	8	50001-59000	60
7601-8500	9	59001-70000	70

* The number of required samples may be dependent on individual wells and distribution systems under your PWS ID. For instance, if you serve 500 people per day but you have two wells that each serve completely different distribution systems you will be required to monitoring each distribution system each month.

B: Examples of RTCR Sample Siting Plans

: Chart - Single Source/Single Distribution (Population ≤ 1000; 1 sample/month)

EPA Water System	PWSID: WY5600xxx	___1_ (#) Sample(s)/month
Routine Sample Location	Repeat Sample Location	GWR sample location (any sources running at the time of a routine TC+)
Unit #11 (DIST)	1) (Same as routine location)	GW -1 (WL01)
(within 5 taps upstream)	2) Unit #14 (DIST)	
(within 5 taps downstream)	3) Unit #8 (DIST)	
Unit # 22 (DIST)	1) (Same as routine location)	GW -1 (WL01)
(within 5 taps upstream)	2) Unit # 26 (DIST)	
(within 5 taps downstream)	3) Unit # 17 (DIST)	
Unit # 4 (DIST)	1) (Same as routine location)	GW -1 (WL01)
(within 5 taps upstream)	2) Unit # 9 (DIST)	
(within 5 taps downstream)	3) Unit # 1 (DIST)	
Unit #11 (DIST)	1) (Same as routine location)	GW -1 (WL01)
(within 5 taps upstream)	2) Unit #14 (DIST)	
(within 5 taps downstream)	3) Unit #8 (DIST)	
Unit # 22 (DIST)	1) (Same as routine location)	GW -1 (WL01)
(within 5 taps upstream)	2) Unit # 26 (DIST)	
(within 5 taps downstream)	3) Unit # 17 (DIST)	
Unit # 4 (DIST)	1) (Same as routine location)	GW -1 (WL01)
(within 5 taps upstream)	2) Unit # 9 (DIST)	
(within 5 taps downstream)	3) Unit # 1 (DIST)	

Example #1: Map for a Single Source/Single Distribution PWS (Population ≤ 1000; 1 sample/month)



Example 2: Chart - Multiple Sources/Multiple Distribution (Population ≤ 1000; 2 samples/month)

PWS Name: EPA Water System		PWSID: WY5600xxx	<u> 2 </u> (#) Sample(s)/month
Month	Routine Sample Location	Repeat Sample Location	GWR sample location (any sources running at the time of a routine TC+)
Girls Camp Distribution System			
January	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
February	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		

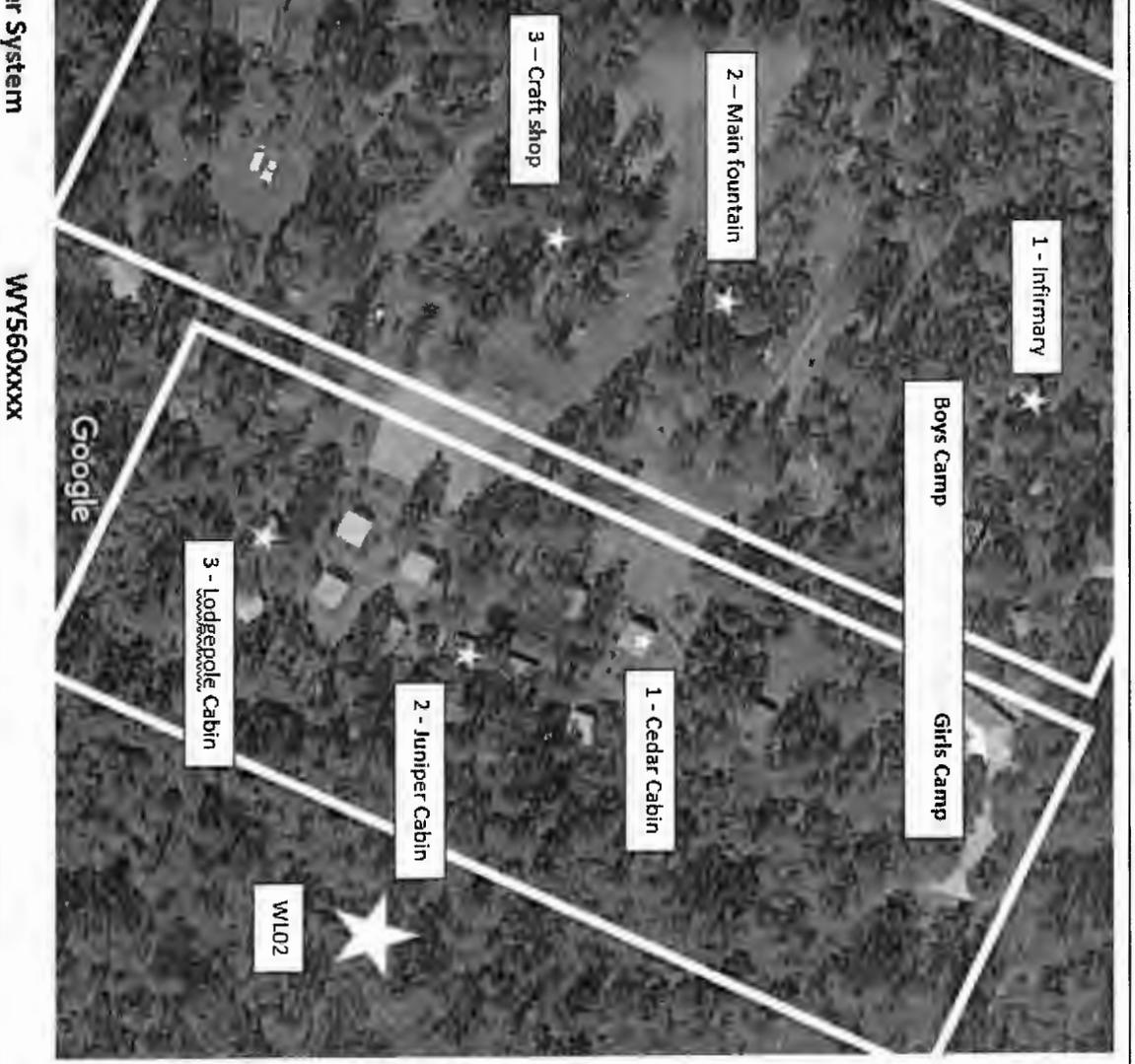
	CLOSED (within 5 taps upstream)	1) (Same as routine location)	
	(within 5 taps downstream)		
	CLOSED - Seasonal Startup (within 5 taps upstream)	1) (Same as routine location)	Will complete Seasonal Startup Checklist in April
	(within 5 taps downstream)		
	Juniper Cabin (DIST) (within 5 taps upstream)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps downstream)	2) Cedar Cabin (DIST)	
	Lodgepole Cabin (DIST) (within 5 taps upstream)	3) Lodgepole Cabin (DIST)	
	(within 5 taps downstream)	1) (Same as routine location)	GW -1 (WL01)
	Cedar Cabin (DIST) (within 5 taps upstream)	2) Juniper Cabin (DIST)	
	(within 5 taps downstream)	3) Lodgepole Cabin (DIST)	
	Juniper Cabin (DIST) (within 5 taps upstream)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps downstream)	2) Cedar Cabin (DIST)	
	CLOSED (within 5 taps upstream)	3) Lodgepole Cabin (DIST)	
	(within 5 taps downstream)	1) (Same as routine location)	
	CLOSED (within 5 taps upstream)	1) (Same as routine location)	
	(within 5 taps downstream)		
	CLOSED (within 5 taps upstream)	1) (Same as routine location)	
	(within 5 taps downstream)		
	CLOSED (within 5 taps upstream)	1) (Same as routine location)	
	(within 5 taps downstream)		
	CLOSED (within 5 taps upstream)	1) (Same as routine location)	
	(within 5 taps downstream)		

Distribution System

CLOSED	1) (Same as routine location)	
---------------	-------------------------------	--

	(within 5 taps upstream)		
	(within 5 taps downstream)		
February	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
March	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
April	CLOSED - Seasonal Startup	1) (Same as routine location)	Will complete Seasonal Startup Checklist in April
	(within 5 taps upstream)		
	(within 5 taps downstream)		
May	Main Fountain (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Infirmary (DIST)	
	(within 5 taps downstream)	3) Craft Shop (DIST)	
June	Craft Shop (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Main Fountain (DIST)	
	(within 5 taps downstream)	3) Infirmary (DIST)	
July	Infirmary (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Craft Shop (DIST)	
	(within 5 taps downstream)	3) Main Fountain (DIST)	
August	Main Fountain (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Infirmary (DIST)	
	(within 5 taps downstream)	3) Craft Shop (DIST)	
September	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		

: Map for a system with Multiple Sources/Multiple Distributions PWS (Population ≤ 1000 ; 2 samples/month)



Addendum C: Example form. Expand the following table as necessary. Feel free to detach and use this example form:

	<u>PWS NAME:</u>	<u>PWS ID #:</u>	
(sample/mo= __)	<u>Routine sample location</u>	<u>Repeat sample locations</u>	<u>GWR sample location (any sources in use at the time of a routine TC+)</u>
January	1)	1) (same as routine location)	
		2)	
		3)	
February	1)	1) (same as routine location)	
		2)	
		3)	
March	1)	1) (same as routine location)	
		2)	
		3)	
April	1)	1) (same as routine location)	
		2)	
		3)	
May	1)	1) (same as routine location)	
		2)	
		3)	
June	1)	1) (same as routine location)	
		2)	

		3)	
	1)	1) (same as routine location)	
		2)	
		3)	
	1)	1) (same as routine location)	
		2)	
		3)	
	1)	1) (same as routine location)	
		2)	
		3)	
	1)	1) (same as routine location)	
		2)	
		3)	
	1)	1) (same as routine location)	
		2)	
		3)	