



FACT SHEET

OFFICE OF DRINKING WATER AND MUNICIPAL ASSISTANCE

THE REVISED TOTAL COLIFORM RULE CHANGES FOR NONCOMMUNITY WATER SUPPLIES Effective April 1, 2016

Noncommunity Water Supplies

A noncommunity water supply (NCWS) is a water supply that provides water for drinking or potable purposes to 25 or more persons at least 60 days per year or has 15 or more service connections. NCWSs include schools, restaurants, churches, factories, campgrounds, and highway rest areas that have their own supply of water – usually a water well.

NCWSs must meet federal and State of Michigan standards for the quality of water they provide to the public. The Michigan Safe Drinking Water Act (SDWA) requires that all NCWSs provide an adequate supply of safe drinking water to customers and consumers.

The Michigan Department of Environmental Quality (DEQ) contracts with local health departments (LHDs) to implement and manage the SDWA at the local level. LHDs provide oversight to noncommunity water supplies for required water quality monitoring and reporting in accordance with the SDWA.



Changes to the Total Coliform Rule

Currently, all public water supplies are regulated under the SDWA. Recent amendments to the rules went into effect on April 1, 2016, with revisions to the Total Coliform Rule (TCR). This revision of the TCR is referred to as the Revised Total Coliform Rule (RTCR) and offers:

- Increased public health protection
- Identification of fecal contamination
- Identification and reduction of potential pathways of entry for fecal contamination

The RTCR maintains a maximum contaminant level (MCL) for *E. coli* and uses *E. coli* and total coliforms to initiate a “find-and-fix” approach to address potential avenues for contaminant entrance into the water distribution system.

It is expected that many NCWSs no longer qualify for reduced total coliform monitoring. Owners and operators must play a more active role to assess their water supplies for possible deficiencies following a coliform positive result. It is also expected that NCWSs may incur additional costs associated with the RTCR due to an increased coliform bacteria sampling frequency.

The baseline monitoring frequency for the majority of NCWSs is quarterly. A reduction in monitoring may remain an option; however, under the RTCR additional steps are required, including an annual assessment of the water supply. Failure to maintain compliance under the RTCR may result in monthly monitoring being required.

NCWS Seasonal Systems

Seasonal systems are defined as a “noncommunity system that is not operated on a year-round basis and starts up and shuts down at the beginning and end of each operating season.” Some examples of seasonal systems include: campgrounds, golf courses, ice cream parlors, and children’s camps.

Under the RTCR, the baseline monitoring frequency for seasonal systems is monthly; however, if certain requirements are met, monitoring may be reduced to quarterly. Seasonal systems monitoring less frequently than monthly must have an approved sample siting plan, monitor during their busiest time periods, and maintain a clean compliance history.

Seasonal systems have unique characteristics that make them susceptible to contamination. As their name implies, seasonal systems are not operated year-round. The depressurizing and dewatering of the water supply presents opportunities for contamination to enter or spread through the distribution system. Even a system that remains pressurized may be subject to water quality problems due to stagnant water.

At the beginning of each operating season and prior to serving water to the public, seasonal NCWSs must:

1. Conduct LHD-approved, seasonal system specific, start-up procedures.
2. Certify the completion of start-up procedures and submit the certificate to the LHD program representative for review.

Summary of the RTCR

1. Maintains the MCL for *E. coli*. The MCL is the legal limit on the amount of a substance that is allowed in public water supplies under the SDWA.
2. Replaces the MCL for total coliform bacteria with a formalized evaluation process to identify sanitary defects in the system and the steps needed to correct them. The “find-and-fix” approach identifies potential routes that could allow contamination into a system.
3. Maintains the current requirement that all supplies have a documented “sample siting plan” that identifies sample collection locations and sampling frequency.
4. Formalizes seasonal system “start-up” procedures. These procedures must be followed and certified by the seasonal system owner or operator before each operating season.

For More Information on Transitioning to the RTCR

Visit the U.S. [Environmental Protection Agency’s Web site](http://water.epa.gov/lawsregs/rulesregs/sdwa/tcr/upload/epa815b13001.pdf) (<http://water.epa.gov/lawsregs/rulesregs/sdwa/tcr/upload/epa815b13001.pdf>) for information on Revised Total Coliform Rule And Total Coliform Rule.

Visit the DEQ’s [Noncommunity Program Web site](http://www.michigan.gov/deqnoncommunitywatersupply) (<http://www.michigan.gov/deqnoncommunitywatersupply>).

Call the Environmental Protection Agency’s Safe Drinking Water Hotline at: 1-800-426-4791