


Transient Non-Community Public Water Systems Training

What Do I Really Need to Know?



**Presenter: Tiffany Mifflin
EPA Region 8's Drinking Water Unit**

OVERVIEW

- **Why Your System is Considered a PWS**
 - **Safe Drinking Water Act in Wyoming**
 - **What You Need to do for EPA**
 - **Review Your Monitoring and Reporting Requirements**
 - **Have Your Water Tested**
 - **Sampling at Proper Locations**
 - **Filling Out Lab Forms**
 - **What to do with Results**
 - **Where to Obtain Information**
 - **System Changes**
 - **Common Errors**
 - **Need Help?**
- 

WHY YOUR SYSTEM IS CONSIDERED A PUBLIC WATER SYSTEM (PWS)

Your facility serves at least 25 individuals at least 60 days of the year or has 15 service connections.

Provide water by means of serving food, water, drinks or ice, restrooms, water faucets, or lodging.

Since your customers do not remain at your facility for long periods of time, your system is classified as a transient non-community water system.



SAFE DRINKING WATER ACT IN WYOMING

Wyoming is the only state that does not have authority to implement the Safe Drinking Water Act. The responsibilities for ensuring safe drinking water are shared between Wyoming Department of Environmental Quality and EPA Region 8.

Additionally, public eating and drinking establishments are monitored by either Wyoming Department of Agriculture Consumer Health Services or the local health department.

So in English what does that mean to me?...



EPA REGION 8 RESPONSIBILITIES:

- **Overseeing monitoring/reporting of testing**
- **Technical assistance to PWS operators**
- **Laboratory certification**
- **Compliance determinations**
- **Sanitary Surveys**
- **Homeland Security**
- **Informal/formal enforcement**



STATE OF WYOMING RESPONSIBILITIES:

- **Plan and spec review**
- **Water rights**
- **Capacity development**
- **Food and beverage inspections**
- **Source water protection**
- **Construction/well drilling permits**
- **Operator certification**
- **Financing drinking water projects**



WHAT DO YOU NEED TO DO FOR EPA REGION 8?

**Review the information we send you
in the activation packet!**



What You Need To Do #1: Review Your TNC Monitoring Requirements

Monitoring and Reporting Requirements for the Calendar Year 2015

February 5, 2015

██████████ A RANCH

PWS ID#: WY56(██████████) (NC/GW)

The facility codes and sample point codes listed with the sampling directions below **MUST** be used in the chain of custody or lab slip submitted to a lab with the sample.

The requirements presented here are based on EPA's current information, which might not be completely accurate. We advise you to compare this information with data from your own files, and contact the appropriate EPA rule manager for corrections or clarification if needed.

Total Coliform (TCR)

Take 1 sample each quarter during 2nd Quarter (Apr-June) and 3rd Quarter (July-Sept).
Take samples throughout the distribution system following your site sampling plan.

If you have a positive sample be sure to consult: <http://www2.epa.gov/region8-waterops/epa-region-8-drinking-water-unit-tech-tips-follow-unsafetotal-coliform-positive> for instructions on further sampling requirements.

If you chlorinate or purchase chlorinated water, you must measure chlorine residual at the same place each time you do bacteriological sampling. Write the chlorine residual results on the sampling sheet and ask your laboratory to forward that information to EPA.

Ground Water Rule

Within 24 hours of being notified of a routine Total Coliform Rule positive (TC+) sample, you must sample for the presence of E. coli at ALL ground water sources in use at the time of the original TC+. Collect one source sample for every routine TCR positive sample. Utilize the Groundwater Source Sampling Form found at the following website: <http://www2.epa.gov/region8-waterops/wy-and-tribal-ground-water-rule-source-water-sampling-triggered-source-monitoring>. On the form you must write the correct Sample Point Code (e.g. GWR Elm Well), which can be found below, and mark the sample as 'Triggered'.

This sampling is in addition to your Total Coliform Rule repeat samples.

FACILITY CODE	FACILITY DESCRIPTION	SAMPLE POINT CODE	SAMPLE POINT DESCRIPTION
WL01	WELL #1 NORTH	GWR WL01	TRIGGERED GWR SOURCE
WL02	WELL #2 MANAGER	GWR WL02	TRIGGERED GWR SOURCE
WL04	WELL #4	GWR WL04	TRIGGERED GWR SOURCE

Included in this document is the monitoring period, required sampling locations (sample point codes) and other important information.

Each Rule Manager may alter your monitoring requirements as needed after reviewing your results, but will notify you of any changes.

What You Need To Do #1:

Review Your TNC Monitoring Requirements

- **Total Coliform Rule**- testing your water to see if there is any bacteria present that is normally found in digestive tracts of animals and soil. Sample location- distribution system.

- **Ground Water Rule**- testing your water to see if it has E. coli. Sample location- ground water source (e.g., well or spring).

- **Nitrate/Nitrite Rule**- testing your water for inorganic chemicals normally found in fertilizer, sewage and animal waste. Sample location- at the entry point to the distribution system after treatment.

- **Surface Water Treatment Rules**- (if you use a surface water source, there are specific treatment monitoring and reporting requirements)- Contact Jake Crosby at 303-312-6389 for more information.



What You Need To Do #2: Have Your Water Tested



- **ALWAYS double check the lab you are using is on the EPA Region 8's Certified Lab List. Some labs may say on their website they are "EPA Certified"; however, they may only be certified for specific contaminants- **not all contaminants!****



Misleading

- You can provide the lab a copy of your monitoring and reporting requirements to show them your sampling requirements.
- Ask the lab for sampling instructions if you are new to sampling.
- Obtain sample bottles from the certified lab. Be sure to note which bottles are to be used for which contaminant as these may differ.

What You Need To Do #3:

Sample at the Proper Sample Point(s)

- Sample points will be noted in your monitoring and reporting requirements as Sample Point Codes and/or in correspondence from the Rule Manager.
- Make sure to sample at ALL sampling points!

Ground Water Rule Within 24 hours of being notified of a routine Total Coliform Rule positive (TC+) sample, you must sample for the presence of E. coli at ALL ground water sources in use at the time of the original TC+. Collect one source sample for every routine TCR positive sample. Utilize the Groundwater Source Sampling Form found at the following website: <http://www2.epa.gov/region8-waterops/wy-and-tribal-ground-water-rule-source-water-sampling-triggered-source-monitoring>. On the form you must write the correct Sample Point Code (e.g. GWR Elm Well), which can be found below, and mark the sample as 'Triggered'.

This sampling is in addition to your Total Coliform Rule repeat samples.

FACILITY CODE	FACILITY DESCRIPTION	SAMPLE POINT CODE	SAMPLE POINT DESCRIPTION
WL01	WELL #1 NORTH	GWR WL01	TRIGGERED GWR SOURCE
WL02	WELL #2 MANAGER	GWR WL02	TRIGGERED GWR SOURCE
WL04	WELL #4	GWR WL04	TRIGGERED GWR SOURCE

WHEN SAMPLING...

Take your time! Rushing can lead to costly mistakes.



**Do not wait until the last week of the monitoring period!
Especially for your Total Coliform Rule samples, it's always best to
sample on a Monday or Tuesday at the beginning of the month in
case you need to collect repeat samples.**



Make sure you are sampling at the correct location.

If you sample at the wrong location, it will be a violation!

What You Need To Do #4: Filling Out the Lab Form

Completely fill out the form including:

- PWS Name
- PWS ID Number (WY560xxxx or WY568xxxx)
- Contact information (cell number and email)
 - Label form with the appropriate sample location from bottle
 - Mark down the correct sample time and date
 - Be sure to indicate what type of sample (routine, repeat, special)

Be sure to contact the lab if you are unsure how to fill out your form!

If you oversee multiple PWSs, please fill out one lab form for each different PWS; do not combine multiple PWSs on one lab slip.

What You Need To Do #4: Filling Out the Lab Form

Chain of Custody and Analytical Request Record

LABORATORIES

PLEASE PRINT- Provide as much information as possible.

Company Name: Example System	Project Name, PWS, Permit, Etc. WY5600000	Sample Origin State: WY	EPA/State Compliance: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Report Mail Address: 123 Example Road, Cody, WY	Contact Name: Mr. Example	Phone/Fax: 307-123-1234	Email: Ex.sample@ex.com
Invoice Address: 123 Example Road, Cody, WY	Invoice Contact & Phone: 307-123-1234	Purchase Order:	Sampler: (Please Print) Mr. Example
Special Report/Formats – ELI must be notified prior to sample submittal for the following: <input type="checkbox"/> DW <input type="checkbox"/> A2LA <input type="checkbox"/> GSA <input type="checkbox"/> EDD/EDT (Electronic Data) <input type="checkbox"/> POTW/WWTP <input type="checkbox"/> LEVEL IV <input type="checkbox"/> State: _____ <input type="checkbox"/> NELAC <input type="checkbox"/> Other: _____	ANALYSIS REQUESTED TCR Nitrates SEE ATTACHED Normal Turnaround (TAT)	RUSH Contact ELI prior to RUSH sample submittal for charges and scheduling – See Instruction Page Comments:	Shipped by: Mr. Example Cooler ID(s): Receipt Temp _____ °C On Ice: Yes No Custody Seal Intact Signature Match Y N Y N Y N

1	SAMPLE IDENTIFICATION (Name, Location, Interval, etc.)	Collection Date	Collection Time	MATRIX	ANALYSIS REQUESTED										SEE ATTACHED	Normal Turnaround (TAT)	RUSH	Comments	LABORATORY USE ONLY
					TCR	Nitrates													
1	Kitchen Sink	9/18/12	10:05 am		X														
2	SP01	9/18/12	11 am			X													
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			

Custody Record MUST be Signed	Relinquished by (print): Mr. Ex Example	Date/Time: 9/18/12	Signature: <i>Ex Example</i>	Received by (print):	Date/Time:	Signature:
	Relinquished by (print):	Date/Time:	Signature:	Received by (print):	Date/Time:	Signature:
	Sample Disposal: Return to Client:	Lab Disposal:	Received by Laboratory:	Date/Time:	Signature:	

What You Need To Do #4: Filling Out the Lab Form

WY and Tribal Ground Water Rule (GWR)

TRIGGERED GROUNDWATER SOURCE SAMPLING FORM

Sampler(s) Section (For field sampler use only)

Reminder: Collect GWR source samples anytime you have a routine TCR positive sample (includes the five additional routine TCR samples required the month after a routine TCR positive sample). Sample each active groundwater source for the same number of routine TCR positive samples. Write the correct Sample Point Code (e.g. GWR WL), which may be found in the yearly Monitoring and Reporting Requirements document sent to all systems. The GWR source samples are in addition to your TCR repeat samples. You cannot use TCR samples as a GWR source sample or vice versa.

Public Water System (PWS) Name: <i>Giddy Up</i>		Sampler's Name: <i>John Smith</i>	
PWS Identification Number (PWSID): <i>WY5609876</i>		Cell Phone Number: <i>307-123-4567</i>	
PWS Street Address: <i>123 S. 34th</i>	City: <i>Lander</i>	State: <i>WY</i>	Zip Code: <i>80543</i>
Comments: (List sources that were inactive or any other information regarding why all groundwater sources were not sampled)			
Sample Collection		Sample Point Code	Groundwater Sample Type- Check One
Date	Time	(Found in the yearly Monitoring and Reporting Requirements document in the GWR section.)	Triggered- 1st source sample(s) after being notified of a routine TCR positive Additional Routines- Required 5 source samples after a GWR EC+ routine result Replacement- If a sample wasn't analyzed previously (e.g. over holding time)
<i>9/22/15</i>	<i>9:00 am</i>	<i>GWR WL01</i>	<input checked="" type="checkbox"/> Triggered <input type="checkbox"/> Additional Following EC+ <input type="checkbox"/> Replacement
			<input type="checkbox"/> Triggered <input type="checkbox"/> Additional Following EC+ <input type="checkbox"/> Replacement
			<input type="checkbox"/> Triggered <input type="checkbox"/> Additional Following EC+ <input type="checkbox"/> Replacement
			<input type="checkbox"/> Triggered <input type="checkbox"/> Additional Following EC+ <input type="checkbox"/> Replacement
			<input type="checkbox"/> Triggered <input type="checkbox"/> Additional Following EC+ <input type="checkbox"/> Replacement
Sampler(s) name (Print): <i>John Smith</i>		Sampler(s) signature: <i>John Smith</i>	
		Date signed: <i>9/22/15</i>	

What You Need To Do #5:

What to do with Results

1) Send copies of your results/forms to EPA by either:

Email: R8DWU@epa.gov

Fax: 1-877-876-9101

Mail: US EPA Region 8

Drinking Water Unit (8P-W-DW)

1595 Wynkoop St.

Denver, CO 80202



Results are due no later than 10 days after the end of the monitoring period.

Make sure your PWS ID# and sampling location(s) are on the results page.

What You Need To Do #5:

What to do with Results

2) Review the results and conduct any required follow-up sampling if needed (e.g., repeat TCR samples and GWR source samples after a positive TCR routine sample).

ALWAYS contact EPA immediately if the results:

- **Exceed the maximum contaminant level for nitrate (10 mg/L) or nitrite (1 mg/L)**
- **Are *E. coli* positive for any GWR or TCR sample result**
- **For Surface Water Systems:**
 - **Exceed the turbidity maximum limit (1 or 5 NTUs)**
 - **The chlorine residual drops below 0.2 mg/L at the point of entry**

What You Need To Do #5:

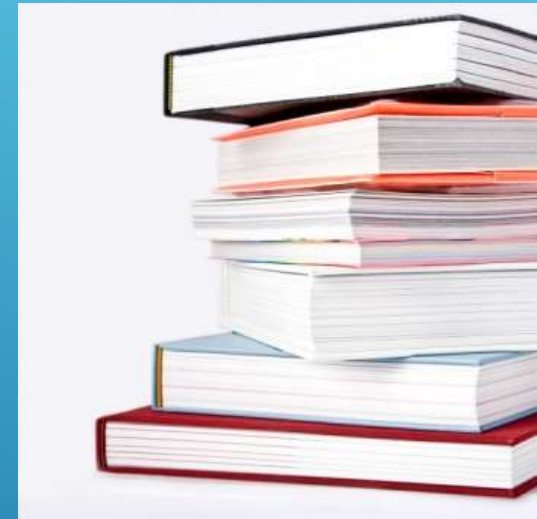
What to do with Results

3) You are required to keep a copy of all your lab samples and correspondence with EPA.

TCR & GWR- records must be kept for 5 years.

Nitrate/Nitrite- records must be kept for 10 years.

SWTR- turbidity & chlorine residual records must be kept for 10 years.



WHERE CAN I OBTAIN INFO?

Drinking Water Online:

<http://www2.epa.gov/region8-waterops>

This site includes information on general sampling and forms, templates and announcements.

Drinking Water Watch:

<https://sdwizr8.epa.gov/Region8DWW/JSP/loginForm.jsp>

On this site you can access system specific information such as monitoring requirements, schematics, etc.

Public Access Drinking Water Watch:

<https://sdwizr8.epa.gov/Region8DWWPUB/>


SYSTEM CHANGES

You must notify EPA if you have any changes to the system contact or ownership, source of water, treatment equipment, or to the facility.



**You can fill out a Change to PWS form found at:
<http://www2.epa.gov/region8-waterops> under the reporting forms tab.**

COMMON MISTAKES

- **Not including your PWS # on your documents/emails**
 - **Not sampling at the correct sampling point locations**
 - **Not providing your phone # when you leave a message**
 - **Not submitting your sample results as required**
 - **Not informing us when there is a change of contact at your water system**
 - **Sending EPA results from a non-certified laboratory**
- 

You wouldn't like me
when I'm angry...



- **Not contacting EPA when you have questions/aren't sure what you need to do.**
 - **We are here to assist you! Don't be afraid to call/email even if you think it is a "dumb" question.**
 - **We can arrange for the Wyoming Association of Rural Water Systems (WARWS) to visit your system and provide on-site assistance free of charge.**
- **Waiting until the end of a monitoring period to sample, which doesn't allow additional sampling requirements to be met if needed (e.g. TCR and repeat sampling)**

QUESTIONS?



If you think of something later, you can always email or call us:

Tiffany Mifflin WY Liaison	Breann Bockstahler Total Coliform Rule Manager	Gail Franklin Ground Water Rule Manager
Mifflin.tiffany@epa.gov	Bockstahler.Breann@epa.gov	Franklin.gail@epa.gov
303-312-6521	303-312-6034	303-312-6497

THANK YOU

The image features the words "THANK YOU" in a bold, 3D, light blue font. The letters are arranged in two rows: "THANK" on top and "YOU" below it. The text is set against a solid black rectangular background. The entire composition is placed on a light blue gradient background. The 3D effect is achieved through shading and perspective, with the letters appearing to rise from the black surface. The word "YOU" is notably larger and more prominent than "THANK".