

Date Signed: June 11, 1997

MEMORANDUM

SUBJECT: *The Data Sharing Committee's Review of the Total Coliform Rule Data Needs and Safe Drinking Water Information System (SDWIS/FED) Reporting Requirements*

FROM: Cynthia C. Dougherty, Director  
Office of Ground Water and Drinking Water

TO: Addressees

The Data Sharing Committee has completed its review of the data needs and reporting requirements for the Total Coliform Rule (TCR). The committee's recommendation to not change the current reporting requirements was reviewed by the Association of State Drinking Water Administrators (ASDWA)/EPA Data Management Steering Committee, the SDWIS Executive Steering Committee, and by all States and Regions. Both of these committees concurred with the recommendation and no objections were raised by any States or Regions. I also agree with the recommendation and am sending this memo to officially notify you of this reaffirmation of the current reporting requirements for the TCR.

As a reminder of what is currently required to be reported to SDWIS/FED under the TCR, I have attached the TCR chapter from the *Consolidated Summary of State Reporting Requirements for the Safe Drinking Water Information System (SDWIS)*, EPA812-B-95-001. States that have any questions on these requirements or on how to report this information to SDWIS/FED should contact their Regional SDWIS Coordinator.

Thank you to everyone who participated in this effort, especially those States and Regions that served directly on the Data Sharing Committee. If you have any further questions on this issue, please contact me at 202-260-5543, or Jan Auerbach at 202-260-5274. You may also wish to contact Tom Poleck, Chair of the Data Sharing Committee, at 312-886-2407.

## Attachment

Addressees: State Drinking Water Administrators  
Regional Drinking Water Program Managers/Coordinators  
Regional Drinking Water Enforcement Managers/Coordinators

cc: Data Sharing Committee  
Data Sharing Committee Advisory Group  
ASDWA/EPA Data Management Steering Committee  
Robert Blanco, OGWDW  
Jan Auerbach, OGWDW  
Vanessa Leiby, ASDWA

## TOTAL COLIFORM RULE

### BACKGROUND

The Total Coliform Rule (TCR) became effective on December 30, 1990, and updated bacteriological monitoring for PWSs. The number of samples to be collected and analyzed is based on system size. The State may permit systems serving  $\leq 1,000$  persons to sample less frequently than monthly if system uses protected ground water, has no history of total coliform contamination, and sanitary survey shows system is free of sanitary defects.

Any samples that test positive for total coliform (TC+) must be analyzed for fecal coliform (FC) or E. coli (i.e., must be speciated). In addition, repeat samples must be collected within 24 hours (longer with State permission). For systems collecting  $< 5$  samples per month, monitoring the next month increases to 5 samples per month following a positive result.

### FRDS/SDWIS REPORTING REQUIREMENTS

#### A. State Decisions

None are required to be reported.

#### B. Violations

Under the TCR, a PWS could incur 2 types of MCL violations and 5 types of M/R violations (as shown in TCR Table 1). TCR Table 2 lists the data elements that must be reported for each TCR violation.

**TCR TABLE 1**  
**C1105-TCR Violation Type Codes**

<b>Violation Type</b>	<b>Description</b>	<b>Code</b>
MCL, Acute	FC+ or <u>E. coli</u> positive (EC+) repeat or TC+ or EC+ repeat following a FC+ routine	21
MCL, Monthly	For systems collecting:  $\geq$ 40 samples - more than 5% are TC+ $<$ 40 samples - $>$ 1 sample TC+ (repeat or routine)  <b>Note: Also applies to systems on quarterly and annual monitoring schedules.</b>	22
M/R, Major Routine	No samples collected for compliance period	23
M/R, Minor Routine	Some but not all samples collected for compliance period	24
M/R, Major Repeat	No follow-up samples collected after a TC+ sample or no speciation	25
M/R, Minor Repeat	Some but not all follow-up samples collected or speciated for compliance period	26
M/R, Sanitary Survey	Fails to have a sanitary survey conducted at the required frequency:  CWS: by 6/29/94 and a min. of 1x/5 yrs, thereafter NCWS: by 6/29/99 and a min. of 1x/10 yrs, thereafter  <b>Note: Only applies to PWSs collecting <math>&lt;</math> 5 samples.</b>	28

**TCR Table 2  
Required Reporting Elements**

FRDS Element No./Name	SDWIS Attributes	Definition	Code Values/Reporting Format	Other
C1101: VIO-ID	FEDERAL_FISCAL_YEAR_NUMBER VIOLATIONS	Code used to identify the violation	yynnnnn, where yy = Fed FY in which state became aware of violation <b>nnnnn</b> = assigned by State or generated by FRDS/SDWIS	When the VIO-ID is generated by FRDS, the first position contains the letter "V."
	D_GENERATED_ID_SOURCE_CODE VIOLATIONS			
	STATE_ASGN_IDENTIFICATION_NUMBER VIOLATIONS			
C1103: VIO- CONTAM	TFRCNTMN_CODE VIOLATION	Contaminant ID for the violation	3100	Not reported for sanitary survey M/R ("28")
C1105: VIO-TYPE	TFRVTYPE_CODE VIOLATION	The type of violation	Refer to TCR Table 1	FRDS will value C1131 VIO-MAJOR-VIOLATION-FLAG for violations "23" - "26." Also see Note 1.
C1107: VIO-COMP- PERIOD-BEGIN DATE	COMPLIANCE_PERIOD_BEGIN_DATE VIOLATION	Date compliance period begins	mmddyy	
C1109 VIO-COMP-PERIOD -END DATE	COMPLIANCE_PERIOD_END_DATE VIOLATION	Date compliance period ends	mmddyy	Optional, if C1111 is reported
C1111: VIO-COMP-PERIOD -MONTHS	Not converted; can be determined from C1107 and C1109	Duration of compliance period in months	3 digits, ranging from 001-120, depending on violation type	Optional, if C1109 is reported. Also see Note 2.

**Note 1:** If multiple TCR M/R violations (i.e., types "23" - "26") are incurred by a PWS during the same compliance period, the state is only required to report one, in the following order of importance:

- 1st - "25", Major Repeat M/R
- 2nd - "23", Major Routine M/R
- 3rd - "26", Minor Repeat M/R

## 4th - "24", Minor Routine M/R

A sanitary survey ("28") violation should always be reported even if it occurs in the same compliance period as the other TCR M/R violation types or MCL violation(s). Similarly, an MCL violation should always be reported, and if both a monthly ("22") and acute MCL violation ("21") occur during the same compliance period, both should be reported.

**Note 2:** a.) For violation types 21 - 26, C111 would =

"001" for monthly monitoring  
 "003" for quarterly monitoring  
 "012" for annual monitoring

b.) For violation type 28, C1111 would =

"042" for CWSs or "102" for NCWSs which did not have sanitary survey by 6/29/94 or 6/29/99, respectively (i.e., 42 or 102 months from TCR effective date of 1/1/91)

"060" for CWSs and "120" for NCWSs which did not have repeat sanitary survey within 5 or 10 years of last survey, respectively (or number of months representing frequency with which states require sanitary surveys)

**Note 3:** A system is considered to have returned to compliance for a "28" violation when it begins collecting 5 or more samples/month or has had a sanitary survey.

### C. Public Notification

Any system that incurs a TCR violation is subject to public notification (PN) requirements contained in §141.32. Mandatory health effects language in §§141.32(e)(11) or (12) must be included in PN materials when a system incurs a "22" (monthly MCL) or "21" (acute MCL) violation, respectively. Failure to meet PN delivery and content requirements, result in a PN violation. Information for the data elements listed in TCR Table 2 must be reported for violations of §141.32 requirements. Additionally, the following values must be specified: C1103 = 3100 and C1105 = 06.

### D. Enforcement Actions

Any formal enforcement actions taken to address a violation must be reported to FRDS/SDWIS. EPA also encourages the reporting of informal enforcement responses. Enforcement actions are reported in the C1200, ENFORCEMENT-DATA record. In addition, enforcement actions must be linked to the violations which they address. Enforcement linking is achieved in the C1280 record, ENF-VIOLATIONS. For more detail on which enforcement actions must be reported to FRDS/SDWIS and the linking of enforcement actions to violations, refer to the summary sheet, entitled, Reporting Enforcement Information.

## DOCUMENT SOURCES

**Primary Source:** Total Coliform Rule (TCR) Implementation Manual, Appendix D - FRDS Reporting, March 1991

**Secondary Sources:**

Release 2.12 - Federal Reporting Data System (FRDS-II) Data Element Dictionary, March 1994 (original release: EPA 812-B-93-003, January 1993)

June 1994 memorandum, entitled, "Requirement for Public Water System which Takes Fewer than Five Total Coliform Samples per Month to Undergo a Sanitary Survey"

\*Note: This memorandum can be found in this manual as Water Supply Guidance Number 82.

FRDS to SDWIS/FED Data Conversion Mapping, May 1995 version.