

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GUIDANCE FROM HOTLINE COMPENDIUM

WSG H28

SUBJECT: Monitoring Requirements for Consecutive
 Public Water Systems (Surface Water Treatment Rule)

SOURCE: Clive Davies

On June 29, 1989, National Primary Drinking Water Regulations (NPDWRs) were promulgated which established disinfection and filtration requirements for public water systems (54 FR 27846). These regulations are commonly referred to as the Surface Water Treatment Rule or SWTR. In reference to the SWTR, the following question was raised:

How are consecutive public water systems required to meet the monitoring requirements of the SWTR?

Response:

40 CFR, Section 141.29, deals with consecutive systems. This section gives primacy agents the option to consider suppliers and consecutive systems as single systems for the purposes of monitoring under any of the drinking water regulations. Therefore, a primacy agent has the authority¹ to consider a supplier and a consecutive system as a single system, or as separate systems, for purposes of compliance with the monitoring requirements of the SWTR and Total Coliform Rule (TCR).

For compliance with the requirements of the two rules, it will often be appropriate for the primacy agent to consider the supplier and consecutive systems as a single system. The requirements, under the SWTR, for source water monitoring, Concentration x Time (CT) value determination, maintenance of entry point disinfectant residuals, dual disinfection components, watershed control programs, operator qualifications, etc., will likely be the responsibility of the supplier. Requirements for distribution system disinfectant residual monitoring under the SWTR and for distribution system coliform monitoring under the TCR will be the responsibility of both supplier and consecutive systems. If treated as one system, the required monitoring plan must address both the supplier's and the consecutive system's distribution system. Computation of compliance with the coliform MCL and disinfectant residual requirements must also be based on the combined results of the sampling from both the supplier and consecutive systems.

¹40 CFR §141.29 requires that primacy agents obtain EPA concurrence on decisions to reduce monitoring for consecutive systems.

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We believe, however, that because of the range of factors involved (e.g., the use of booster chlorination, the possible existence of emergency surface water sources, the relative sizes and capabilities of the parent and secondary systems, etc.) the decision of how to treat a secondary system must be made on a case-by-case basis, and that the primacy agent is in the best position to make that decision¹.