

NEBRASKA DEPARTMENT OF HEALTH AND HUMAN SERVICES

# GUIDANCE DOCUMENT

“This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Nebraska Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.”

Pursuant to  
Neb. Rev. Stat. § 84-901.03

## REPEAT MONITORING

### Revised Total Coliform Rule

Beginning April 1, 2016, this fact sheet applies to public water systems (PWSs) serving 1,000 or fewer people that are required to conduct repeat monitoring when a water sample is POSITIVE FOR TOTAL COLIFORM (TC+) BACTERIA.

#### **STEP 1: COLLECT 3 REPEAT SAMPLES FOR EACH ROUTINE TC+ SAMPLE**

A SYSTEM MUST COLLECT A SET OF 3 REPEAT SAMPLES AFTER EACH TC+ ROUTINE SAMPLE or the system will be required to perform an assessment. See RTCR Fact Sheet, Assessments and Corrective Actions. A set of 3 repeat samples must be collected until either TC is not detected in one complete set of repeat samples or an assessment is triggered.

#### Repeat Sampling Locations

A system must collect at least 3 repeat samples at the locations described in its sample siting plan: (1) 1 repeat sample at the original routine location, (2) 1 repeat sample within five service connections upstream, and (3) 1 repeat sample within five service connections downstream of the TC+ sample; OR the system may develop a standard operating procedure (SOP)\* in its sample siting plan for the collection of repeat samples. The SOP must be designed to focus the repeat samples at locations that best verify and determine the extent of potential contamination of a distribution system area based on specific situations. The sites must be representative of the distribution system. The Department may modify the SOP or require alternative monitoring locations as needed.

#### Ground Water Rule Reminder

The Ground Water Rule has not changed. Any positive routine coliform sample triggers sampling of the ground water source wells providing water to the system. One such triggered sample bottle may be automatically sent to the system, along with the repeat sample kits. The system operator must request any additional sample kits needed.

Also, consecutive systems—those which buy water from another system—must notify the system providing water within 24 hours of a positive routine coliform sample. The water provider must then request triggered sample kits and sample its wells. Contact Mary Poe at 402-471-1003 or [mary.poe@nebraska.gov](mailto:mary.poe@nebraska.gov) with questions regarding ground water samples.

#### \*Sample Siting Plan Repeat Sample Site SOP Example

Repeat samples will be taken within 5 service connections upstream and downstream from the TC+ site when feasible. They may be taken more than 5 service connections from the TC+ sample when no site within that distance is available that meets the criteria for a routine sample. A repeat site will be clean, representative of the distribution system, available, and in the same area of the distribution system as the site at which the TC+ sample was taken.

## STEP 2: CONDUCT ACTIONS REQUIRED AS A RESULT OF REPEAT SAMPLING

- ✓ **TC+** = Total coliform-positive or present; **TC-** = Total coliform-negative or absent
- ✓ **EC+** = *E. coli*-positive or present; **EC-** = *E. coli*-negative or absent

The system must COMPLETE AN ASSESSMENT AND SUBMIT THE FORM TO THE DEPARTMENT WITHIN 30 DAYS after learning the PWS triggered an assessment. See the RTCR Fact Sheet: Assessments and Corrective Actions.

If Routine Sample Is	And	Any Repeat Sample Is:	Action: What do the sample results mean?	Violation
TC+ EC-	&	TC+ EC-	The presence of total coliform bacteria in both the original routine sample and in the follow-up repeat sample suggests there could be a problem and the water may not be safe to use. 1. Conduct a Level 1 or Level 2 assessment. The Department will tell the system which type of assessment is required.	No MCL violation
TC+ EC-	&	TC+ EC+	The presence of <i>E. coli</i> bacteria in the system's water is an indicator of fecal contamination and the water may not be safe to use. The Department will consult with the system. 1. Issue a Public Notice (PN) within 24 hours. 2. Conduct a Level 2 assessment within 30 days.	<i>E. coli</i> MCL violation*
TC+ EC-	&	Any or all repeat samples missing	The presence of total coliform bacteria in the original routine sample suggests there could be a problem, and because repeat samples were not tested, it is unknown whether or not the water is safe to use. 1. Conduct a Level 1 or Level 2 assessment.	No MCL violation
TC+ EC+	&	TC+	The presence of <i>E. coli</i> bacteria in the water is an indicator of fecal contamination and the water may not be safe to use. The Department will consult with the system. 1. Issue a PN within 24 hours. 2. Conduct a Level 2 assessment within 30 days.	<i>E. coli</i> MCL violation*
TC+ EC+	&	Any or all repeat samples missing	The presence of <i>E. coli</i> bacteria in the water is an indicator of fecal contamination and the water may not be safe to use. The Department will consult with the system. 1. Issue a PN within 24 hours. 2. Conduct a Level 2 assessment within 30 days.	<i>E. coli</i> MCL violation*

### NOTE

\* A system is required to provide Tier 1 public notice within 24 hours of the Department's notification and consultation in response to an *E. coli* MCL violation. For more information, visit our website at <http://dhhs.ne.gov/drinkingwater> or contact Sherry Wirth at 402-471-0932.