

Revised Total Coliform Assessment Factsheet



NJDEP – Division of Water Supply and Geoscience

What is a Revised Total Coliform Level 1 or Level 2 Assessment? When Revised Total Coliform Rule (effective April 1, 2016) monitoring shows that a public water system is vulnerable to microbial contamination, the system is required to conduct an “assessment” to identify sanitary defects and to take corrective action. “Sanitary defects” can provide a pathway for microbial contamination to enter the distribution system (DS) or can indicate a failure of a barrier, such as treatment. The type of assessment – Level 1 or Level 2 – is based upon the number of positive total coliform (TC) or *E. coli* (EC) routine and repeat samples collected and/or the system’s microbiological results from the previous 12-months. Completed Level 1 and Level 2 Assessments are due to the NJDEP 30 days after the system learns they have triggered the criteria for conducting the assessment: upon receiving notification of the results. Failure to submit a complete assessment form is a violation which will require additional measures and possible enforcement actions including the issuance of penalties.

What triggers a Level 1 or 2 Assessment?

Based on the severity and frequency of the contamination

Level 1 Assessment¹

Triggered by confirmed TC+ in the DS, based on all compliance samples for the monitoring period as follows:

- < 40 Samples
 - ≥ 2 or more TC+ samples
- ≥ 40 Samples
 - >5.0% TC+ samples
- Failure to take every required repeat sample after any TC+ results

Level 2 Assessment (L2A)

Triggered by confirmed EC+ or chronic TC+² in the DS based on all compliance samples for the monitoring period as follows:

- EC+ repeat sample, following a TC+ routine
- TC+ repeat samples, following EC+ routine
- Failure to collect repeat samples after EC+ routine
- Failure to test for EC when any routine or repeat tests TC+
- Two Level 1 assessment triggers in a rolling 12-month period

Who can complete a Level 1 or 2 Assessment?

- **Level 1 Assessment:** a basic physical inspection of the system performed by the system owner or designee
- **Level 2 Assessment:** an in-depth inspection of the system performed by an approved party in accordance with N.J.A.C. 7:10-5.8(3)

Approved Parties to Complete the Level 2 Assessment:

- licensed operator³
- licensed well driller
- licensed professional engineer
- licensed pump installer
- county/state official, upon approval

Need help finding an Approved Party?

For community and nontransient noncommunity water systems, the licensed operator is an approved party to complete the Level 2 Assessment.

For transient noncommunity systems without a licensed operator, New Jersey Water Association (NJWA) is available to recommend licensed operators in your area with an appropriate license class.

Contact NJWA through their website njwater.org

TNC can also reach out to their County Health Department for further assistance.

Notes

1. All routine and repeat samples are compliance samples; therefore, the 40 samples per month includes routine and repeat samples for determining a Level 1 Assessment trigger.
2. When two Level 1 Assessments have been triggered within a rolling 12-month period.
3. A licensed operator must hold a license of equal or greater to the license class required to operate the system.

RTCR Level Assessments Factsheet



Common Deficiencies on the Level 1 or 2 Assessment forms

Form is left incomplete. Complete all questions on the form to the best of your ability. Use the comment space provided next to each question. In the Sampling section, consider calling your lab and asking them to help you answer the questions. The questions in this section were written so that the lab is not required to fill out the assessment form.

No Site Visit Date. The site visit date is **the date that a physical inspection of the system was conducted**. Level 1 Assessments can be completed by the owner/system designee. Level 2 Assessments must be completed by an approved party.

Summary section of the form is not completed. Summaries should include all sanitary defects or issues found identified by “yes” answers to questions throughout the form. **All identified sanitary defects must have an associated corrective action with a date of completion or proposed timeline of completion when the form is submitted.** If necessary, attach additional pages to submit all details of defects and proposed corrective actions, including invoices of work completed/to be completed, practices used for shock chlorination, etc.

Not providing a sufficient response to questions throughout the form. **Systems can always attach additional sheets as necessary** in response to questions on each individual source (i.e. well, intake), treatment unit (i.e. filter, UV light, ion exchange, etc.), storage facility, distribution zone, sample location, or sample tap if space is not sufficient. The assessment form may be deemed deficient if details are lacking in response to sanitary defects.

Shock chlorinating the well and distribution system without finding defects. Systems should consult with the Division of Water Supply and Geoscience prior to shock chlorinating the well or distribution system if they do not find issues during the assessment. Failure to consult the Division may result in the system having to take additional corrective actions, disinfecting again and collecting additional samples.

No Signatures on the Assessment Forms. Be sure all parties participating in the assessment sign and date the form and provide clear details on findings, corrective actions, and associated timeline for completed and proposed items. **All level assessments must contain original signatures.** For each section where a lab or 3rd party was consulted, the lab or 3rd party should sign the assessment form, i.e. if the lab is consulted on a question about sampling procedures, the 3rd party personnel **must** sign and date the assessment form with their information as necessary on those assessment questions.

Address all Storage Facilities. Storage facilities questions pertain to all types of storage reservoirs (i.e. below ground, above ground, elevated, indoor, outdoor, opened, closed, gravity, pneumatic, etc.). If more than one storage facility exists, provide responses for each unique storage facility.

Power Outage Occurred. If a power outage occurred, include the dates of the outage for comparison with the contamination date. If the outage is due to an area wide power outage, those specific date(s) and time(s) should be available from the power supplier.

Updated Forms from June 2018 are writable PDFs. Consider emailing the completed assessment as the fillable form PDF file to watersupply@dep.nj.gov instead of printing handwriting and scanning the form.

Are you having trouble completing the Level 1 or Level 2 Assessment form?
Contact the NJDEP Division of Water Supply and Geoscience for help at 609-292-5550.