United States Environmental Protection Agency

Region 8
Mountains and Plains

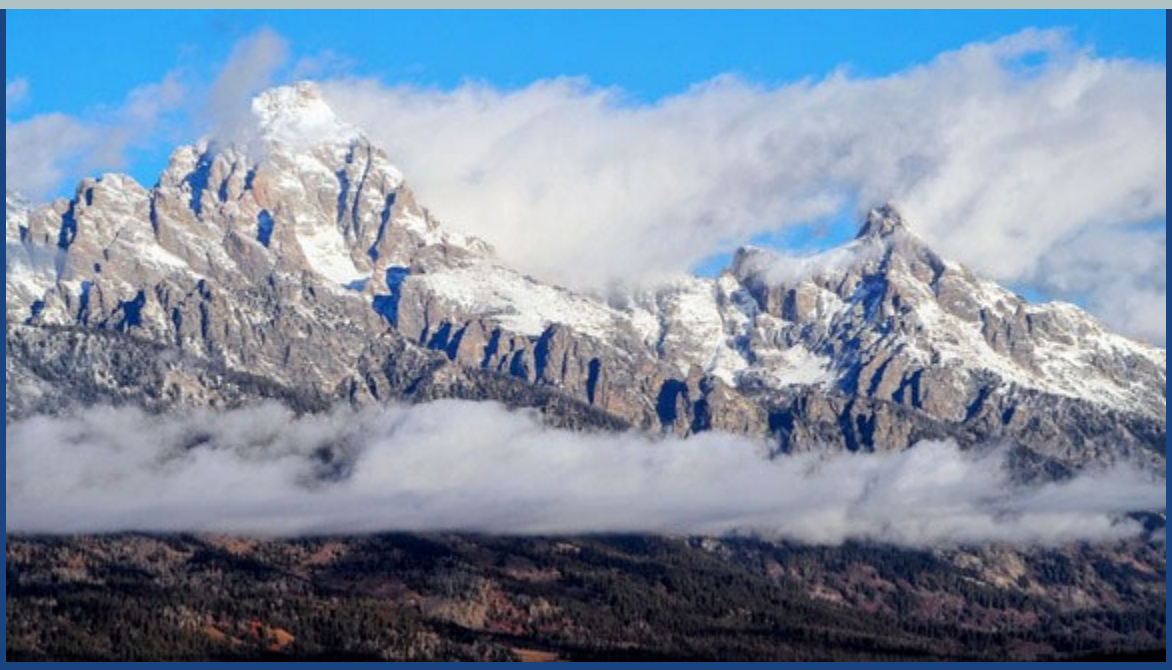

Photo Credit - Lucienne Gassie

2026 NEWSLETTER
EPA REGION 8
DRINKING WATER PROGRAM
Wyoming and Tribal Water Systems

After-Hours Emergency Phone Number

New Fax Number

Staff Changes

Website Information

Monitoring Requirement Guide

Chemical and Radionuclide Reminders

Sample Shipping Best Practices

PFAS Initial Monitoring Information

Asbestos-Containing Pipe Management

Wyoming Service Line Inventory Information

Tribal Service Line Inventory Information

Storage Tank Requirements

Change Form Information

Tier 1 PN Information

Lead and Copper Tap Sample Site Plan Guide

Consumer Confidence Report Information

What's in a Sample Bottle Name

Urgent—Drinking Water Emergencies

If you have a drinking water emergency outside normal business hours (evenings, weekends, or holidays) - for example, a distribution to your water supply or a contamination event involving *E. coli* or other contaminants - call the Region 8 after-hours emergency line immediately at 303-312-6327. For incidents during Monday through Friday working hours, please contact a Region 8 Drinking Water Program staff member for assistance.

New U.S. EPA Region 8 Fax Number

(Yes, we still have a fax)

Effective January 20, 2025, our fax number is 303-312-7517. Please update your system's information. Note: You won't receive an error if you fax the old number. For faster, more reliable communication, please use R8DWU@epa.gov and include a clear subject line to route your email to the right team

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Staff Additions

Emily Bedell – Radionuclides Rule Manager

Emily Bedell joined the Safe Drinking Water Branch in the Radionuclide Rule Manager position at the end of January. Additionally, she will be providing compliance assistance activities for the Revised Total Coliform Rule and Aircraft Drinking Water Rule. Emily has prior experience as an environmental engineer that managed the design of an in-situ microbial water quality sensor. She is a graduate research assistant that supported development processes around water quality and water access with organizations like the Millennium Water Alliance, USAID, Living Water International, Water for People, and Food for the Hungry, in addition to serving as a water quality engineer in Western Uganda. Emily received an MS in Mechanical Engineering from Portland State University and a PhD in Environmental Engineering from University of Colorado.

Emily is an avid runner and bikes to work regularly. Please welcome Emily to the Safe Drinking Water Branch in Region 8.

Moving On….

Curt Tandy - Data Support Contractor

Before retiring last year, Curt served as our IT specialist and primary interfacing application developer, designing and maintaining the connective tools that bridged our program databases with user-facing workflows for queries, letter generation, and technical requests. He implemented and supported integration to streamline data exchange, automated correspondence through templated services, reduced manual entry, and improved data integrity. Curt also administered user access and security controls, provided troubleshooting and training, and ensured updates to application and forms were current versions, accessible, and aligned with program needs across teams.

Bob Clement – State Coordinator

Before retiring last year, Bob served as our Montana and Colorado State Coordinator, providing decades-long civil service that anchored state implementation of the Safe Drinking Water Act and the National Primary Drinking Water Regulation. In this capacity, he led Capacity Development program oversight, advising state partners on strategies to ensure

technical, managerial, and financial capability of public water systems, and he served as a Primacy Revision Reviewer, evaluating state rule packages and program changes to confirm they are no less stringent than federal requirements and supported effective compliance, monitoring, reporting, and enforcement. Bob's portfolio included coordinating intergovernmental consultations, aligning state policies with federal regulatory frameworks, mentoring staff on primacy and program operations, and strengthening administrative records to support defensible decision-making across Montana and Colorado.

Jasmine Summers-Evans – State Coordinator

Before departing the Agency last year, Jasmine served as our North Dakota and South Dakota Coordinator, while overseeing Program File Reviews (PFRs) to strengthen coordination and documentation across Region 8 states. She planned and executed PFRs to audit administrative records and program performance, including monitoring and reporting, sanitary surveys, enforcement, capacity development, and follow-up on corrective measures.

EPA's Website for Drinking Water Resources

EPA Region 8 has a website, https://www.epa.gov/region8-waterops, for drinking water system operations in Wyoming and on Tribal lands containing many resources you may need or find helpful. The website is divided into six sections: (1) Drinking Water Programs, (2) Emergency Preparedness, (3) Reporting Results, (4) Regulations and Compliance, (5) Monitoring and Sampling, and (6) Operations and Assistance.

Some key resources by section include the following:

Drinking Water Programs

- Basic Information about Wyoming & Tribal Drinking Water Programs
- Drinking Water Watch, the tool that enables you to:
    - View water quality data that the EPA has received
    - Generate a report to help you develop your annual Consumer Confidence Report

Emergency Preparedness

- Measures to take if you have pressure loss
- Boil water advisory template when an *Escherichia coli* (*coli*) maximum contaminant level (MCL) exceedance occurs
- Follow-up actions for total coliform positive or *coli* positive results
- Planning for natural disasters and improved security

Reporting Results

- Forms to report changes to water source, treatment, water system facilities, system contacts and/or management, as well as seasonal operations
- Reporting monitoring results to the EPA (R8DWU@epa.gov)
- Reporting Public Notice information to your consumers

- Reporting Consumer confidence resources to your consumers
- Templates for emergency response planning and lead and copper tap sample site plans, and forms for maximum residual disinfectant level and sanitary surveys

Regulations and Compliance

- EPA's regulated analytes list
- Tips to stay in compliance
- Revised Total Coliform Rule requirements
- Lead service line inventory requirements

Monitoring and Sampling

- List of certified laboratories
- Sample collection guide
- Harmful Algal Bloom Response

Operations and Assistance

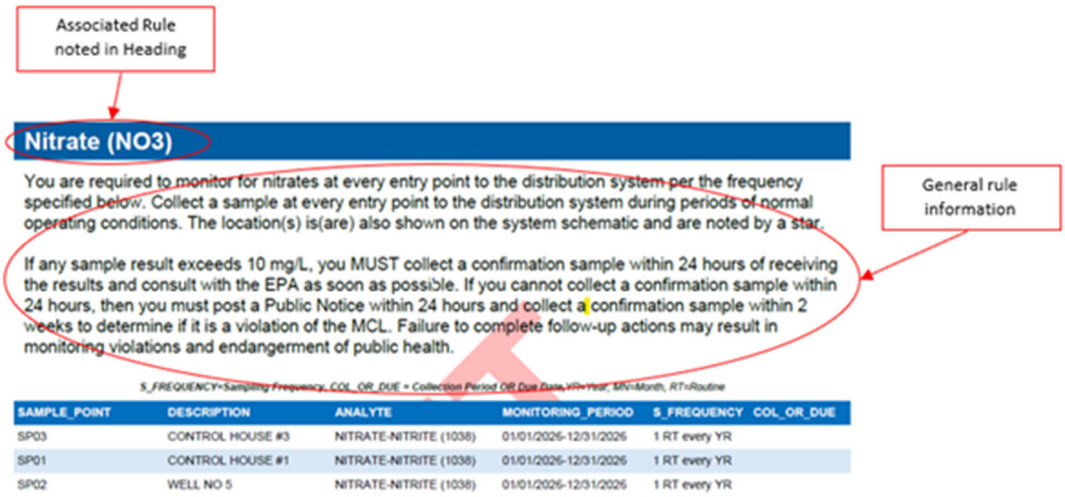
- Preparing for a sanitary survey and tech tips
- Operational Improvements and Capacity Resources
- Training presentations
- Operator Training & Certification
- Funding sources

Our **staff contact list** is available in the yellow "Need Help" box on the right-hand side of the home screen.

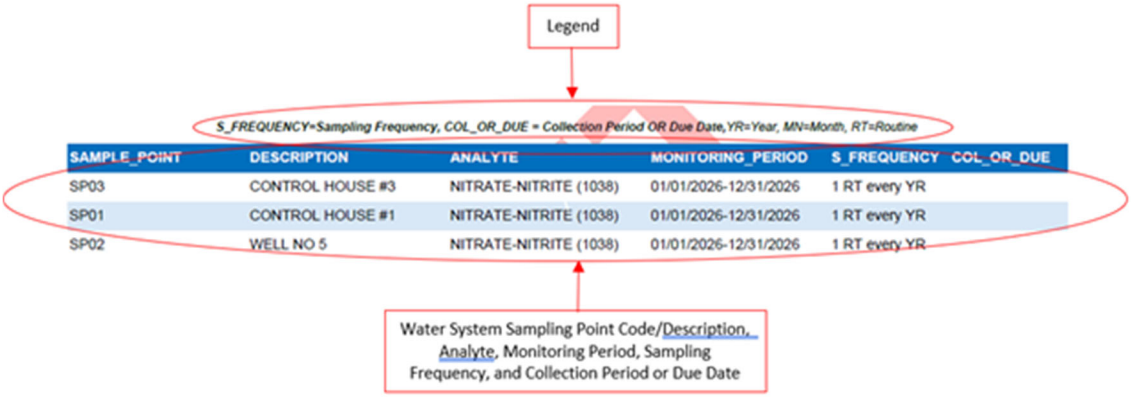
What You Need To Do Next With The New Monitoring Requirements Format

Why is the Monitoring Requirements Format Changing? EPA is using a new method to generate each system's Monitoring Requirements. This new method required a format change. The purpose of this document is to guide users on using the new Monitoring Requirement report.

Review Requirements – Your water system is required to monitor for all contaminants noted in your Monitoring and Reporting Requirements report, which will also indicate the required number of samples, frequency and timeframe. It might be beneficial to create a sampling calendar based on these Monitoring and Reporting Requirements. Please plan on collecting samples early in your monitoring periods, so you can re-sample if there are shipment or laboratory analysis issues to avoid failure to monitor compliance issues.



Identify Sample Points – Make sure to sample at all approved sampling points and at the correct locations! These are noted in your monitoring requirements or in correspondence from the Rule Manager. Those noted in your monitoring requirement have identified the sample point code that should be noted on the sample bottle and lab slip. The example below notes three required sampling points, so three samples must be submitted. If you sample at the wrong location, the samples will not count for compliance. Headings are defined in the legend above the table.

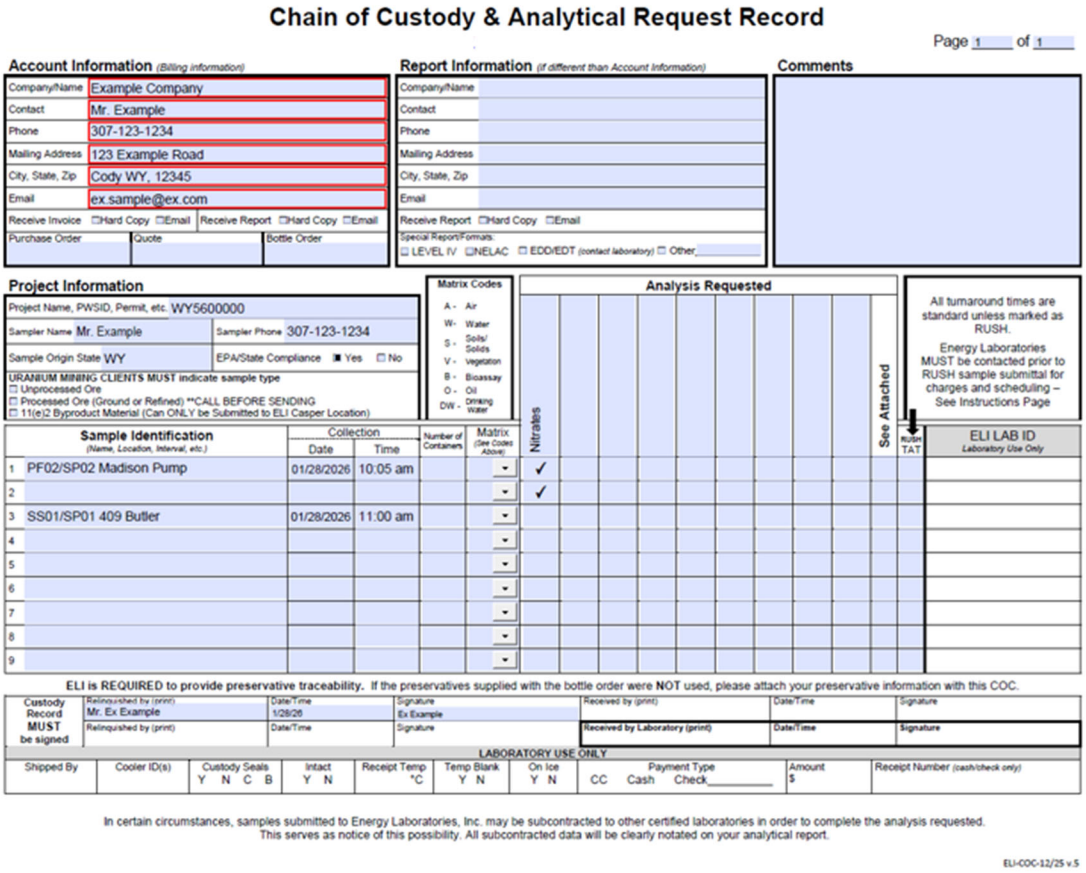


The table will contain the most critical information for your monitoring requirements, and it is important to familiarize yourself with this new format. The sample point is the EPA designated code for the sample location. The description is the public water system name or description for the sample location. The analyte is the name of the analyte along with the EPA code for the analyte in parathesis. The timeframe for when the sample must be collected will be described in the monitoring period or collection period (COL_OR_DUE) columns. The sample frequency will describe the number of samples required. Be sure to read the table entirely as some of the information may not be presented in chronological order.

Contact Lab – New systems will be sent the current copy of certified labs by the EPA. Make sure the lab is certified for all contaminants for each rule for which you are sampling! The lab list is updated often and the current list can always be found online. Contact the lab for sampling instructions if you should have any questions. Obtain the bottles from the

certified lab and be sure to note which bottles are to be used for each specific contaminant, as these differ.

Fill Out Chain of Custody/Lab Form Completely – Make sure you completely fill out the form: PWS Name, PWS ID Number (WY560xxxx or 08XXXXXXX), and Contact Information (cell number and email). Label the form using the appropriate Sample Point and Description (as listed in the above example), and the correct sample time and date. For the Revised Total Coliform Rule, please indicate as either ROUTINE (regular sample), REPEAT (for increased monitoring and/or a possible exceedance) or SPECIAL (not for compliance). Note: Ground Water Rule has a separate required form that can be found online.



Chain of Custody & Analytical Request Record

Page 1 of 1

Account Information (Billing information)

Company/Name	Example Company
Contact	Mr. Example
Phone	307-123-1234
Mailing Address	123 Example Road
City, State, Zip	Cody WY, 12345
Email	ex.sample@ex.com

Receive Invoice ☐Hard Copy ☐Email | Receive Report ☐Hard Copy ☐Email

Purchase Order | Quote | Bottle Order

Report Information (If different than Account Information)

Company/Name	
Contact	
Phone	
Mailing Address	
City, State, Zip	
Email	

Receive Report ☐Hard Copy ☐Email

Special Report/Formats: ☐ LEVEL IV ☐NELAC ☐ EDD/EDT (contact laboratory) ☐ Other

Comments

Project Information

Project Name, PWSID, Permit, etc. WY5600000

Sampler Name Mr. Example | Sampler Phone 307-123-1234

Sample Origin State WY | EPA/State Compliance ■ Yes ☐ No

URANIUM MINING CLIENTS MUST indicate sample type
☐ Unprocessed Ore
☐ Processed Ore (Ground or Refined) **CALL BEFORE SENDING
☐ 11(e)2 Byproduct Material (Can ONLY be Submitted to ELI Casper Location)

Matrix Codes: A - Air; W - Water; S - Soils/Solids; V - Vegetation; B - Bioassay; O - Oil; DW - Drinking Water

Analysis Requested

All turnaround times are standard unless marked as RUSH.
Energy Laboratories MUST be contacted prior to RUSH sample submittal for charges and scheduling – See Instructions Page

	Sample Identification (Name, Location, Interval, etc.)	Collection Date	Collection Time	Number of Containers	Matrix (See Codes Above)	Nitrates	See Attached	RUSH TAT	ELI LAB ID (Laboratory Use Only)
1	PF02/SP02 Madison Pump	01/28/2026	10:05 am			✓			
2						✓			
3	SS01/SP01 409 Butler	01/28/2026	11:00 am						
4									
5									
6									
7									
8									
9									

ELI is REQUIRED to provide preservative traceability. If the preservatives supplied with the bottle order were NOT used, please attach your preservative information with this COC.

Custody Record MUST be signed	Relinquished by (print)	Date/Time	Signature	Received by (print)	Date/Time	Signature
	Mr. Ex Example	1/28/26	Ex Example			
	Relinquished by (print)	Date/Time	Signature	Received by Laboratory (print)	Date/Time	Signature

LABORATORY USE ONLY

Shipped By	Cooler ID(s)	Custody Seals Y N C B	Intact Y N	Receipt Temp °C	Temp Blank Y N	On Ice Y N	Payment Type CC Cash Check	Amount $	Receipt Number (cash/check only)

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All subcontracted data will be clearly notated on your analytical report.

ELI-COC-12/25 v.5

Be Timely in Submitting Results to the EPA – Please submit all sampling results to the EPA as soon as you receive them from the lab. Depending on your sample results, follow-up actions such as public notice or confirmation samples may be required. If you delay in reporting to the EPA, you may miss your opportunity to complete these actions in a timely manner and incur violations. If you would like the lab to send your data directly to the EPA, work with the lab directly on this request. Otherwise, you can send copies of your results/forms to the EPA using one of the following methods:

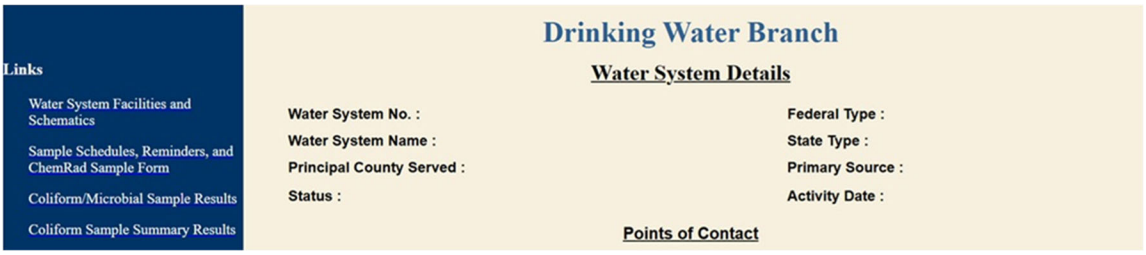
Email: R8DWU@epa.gov ** Fax: 303-312-7517

Mail: U.S. EPA Region 8, Drinking Water Unit (8WD-SDR), 1595 Wynkoop Street, Denver, CO 80202

Review the Results Right Away – Contact the appropriate EPA Rule Manager immediately if any of the results:

- Exceed the Maximum Contaminant Level (MCL) for any contaminant. MCL for contaminants are available online and are typically listed on the lab results.
- Have an *E. coli* positive for any GWR or TCR sample result.
- For Surface Water – Exceed the turbidity maximum limit (1 or 5 NTUs).
- For Surface Water – Chlorine residual drops below 2 mg/L at the point of entry.

All these items may require additional samples or actions, so take your regular samples early in the monitoring period to allow extra time and avoid compliance issues. As an example, a common suggestion is to take your routine RTCR samples early in the working week, which will allow any necessary follow-up sampling to be completed within the working week when laboratories remain open. One way to ensure that the EPA has received your results is to go to our Public Drinking Water Watch website. You need to select Wyoming or Region 8 Tribes, type in your PWS ID, and once you can view your water system, the links on the left side of the page will take you to the sample pages (and other useful info) that you need to review.



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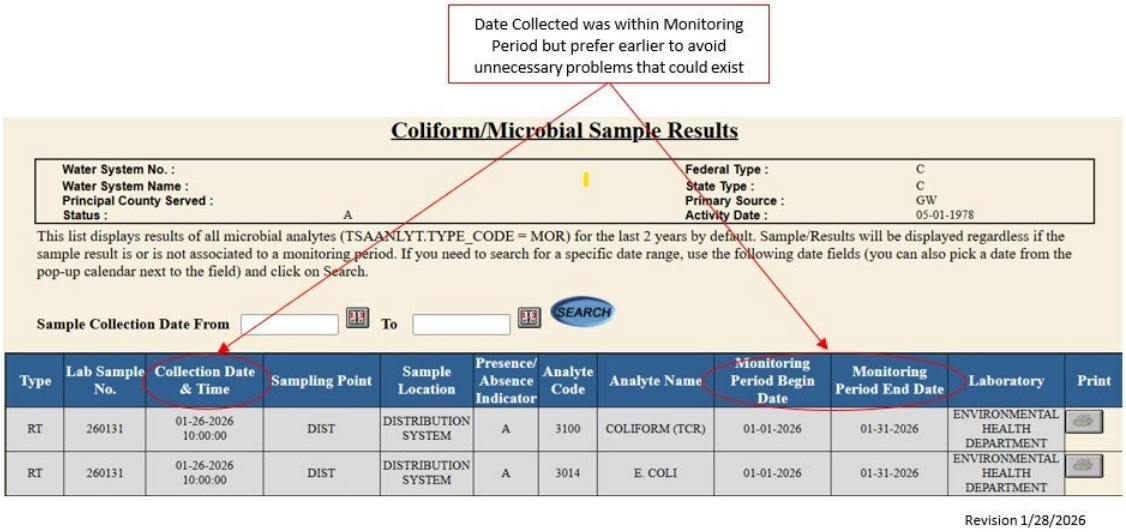
A sample page of viewing the Coliform/Microbial Sample Results for a water system:



Important Reminders for Chemical, Nitrate, and Radionuclide Sampling

Lab requests

Please do not specify analytical methods on your lab requests (i.e. chains of custody). Laboratories can use different approved methods to analyze drinking water samples. By requesting a specific method, lab personnel are prevented from using alternate methods of analyses, if necessary, due to equipment downtime or the sensitivity limits of a particular method. Also, the lab may not be certified or accredited for the method you specify. This can significantly slow down or even stop the lab from analyzing your samples.

Also, please do not ask for state-required analyses in lab requests or assume your laboratory knows what to test for in your samples. State requirements for chemical compliance testing are different than EPA-required testing, and some required chemicals will not be analyzed. This could result in a monitoring and reporting violation of the missing federally regulated contaminants. On your lab request forms, simply request EPA IOCs, EPA SOCs, or EPA VOCs, and refer the lab to EPA's regulated analytes list.

Include PWSID and sampling locations on your Chain of Custody and use a certified laboratory

Be sure to include your public water system identification (PWSID) number and appropriate sampling location on all laboratory request forms. If you are unsure of the sampling location, check the schematic that is included with your annual Monitoring and Reporting Requirements Report ("To Do"), which is emailed to you every February.

Note that sampling locations for chemical, nitrate, and radionuclides are different than for bacteria. Please do not sample for chemical, nitrate, and radionuclides at the same location that you would normally sample for bacteria. If in doubt, always check your system schematic and sample at the locations designated by the red star .

Make sure the laboratory you use is certified for drinking water analysis through their home state, the EPA, or a TNI/NELAP program (i.e. The NELAC Institute/National Environmental Laboratory Accreditation Program). Other accreditations, such as A2LA or ISO, are not considered equivalent for compliance sample analysis.

Spring and warmer temperatures are coming!

As we approach warmer months, be aware that samples being sent for analyses will require extra ice packs. The EPA cannot accept results for drinking water samples that arrive at the lab above the 6º C (42º F) maximum temperature allowed for analyses. If your lab recommends the use of ice packs, freeze the ice packs for at least 72 hours prior to sampling. Do not sample until the ice packs are frozen solid.

Certified labs must notify their clients if samples arrive outside the temperature requirements. Contact the EPA for direction if this happens.

Send results to EPA Region 8

While some laboratories will automatically send results to us, many do not. It is the responsibility of each water system to ensure that we receive your results. It is highly

recommended that you coordinate with your laboratory to ensure laboratory results are properly submitted by the required deadlines. You can email results to R8DWU@epa.gov or FAX them to us at **303-312-7517** (please note that this is a NEW FAX number).

Summer - Best Sample Shipping Practice

If this coming summer is like the last few summers, maintaining sample integrity during shipping will be challenging. Summer temperatures have been high, and the shipping sector can be impacted by resource shortages.

Here are some tips and considerations to ensure your samples arrive at your laboratory within temperature and hold-time requirements. Always check with your certified lab for their packing and shipping recommendations.

Some overall considerations:

- Sample early in the compliance period so if sample temperature and hold time are exceeded or there are shipment delays, you can resample before the end the monitoring compliance period and avoid violations.

- Hold times for contaminants vary from very short (e.g., total coliform, nitrate/nitrite, asbestos) to longer times, and they are dictated by the testing to be performed on the samples. The hold time begins when you collect your sample and ends when the laboratory analyzes your sample. The hold time does not end when the lab receives the sample, and most samples require some time for setup, so build extra time in planning for sample shipment.

- Check with your lab for instructions and any recommendations.
- Lab staffing on weekends is not a guarantee. Notify the lab if shipments will arrive near or on a weekend.
- Certifications require labs to notify their clients if samples arrive outside the requirements for temperature, hold time, and volume. Contact the EPA for direction if this happens.
- Most carriers do NOT store shipments overnight in a temperature-regulated facility. Coolers and boxes are usually stored on trucks in lots, subject to outside temperature extremes.
- Some next day air shipments may be transported out of state and then to your lab, so shipments could be affected by weather delays outside of the state from which samples were collected.

Ensuring Adequate Cooling and Successful Sample Delivery

- Make sure there is adequate cooling and increase the amount of ice used during summer shipments.
- Almost always, samples should be kept cool at <6 degrees C or <42 degrees F.
- If your cooler is too small for adequate ice, request a larger cooler.
- Place your samples in the middle of the cooler as far away from the sides as possible.
- In general, wet ice cools better than blue ice or ice packs. A mixture of ice blocks and wet ice can be used for additional cooling.
- If your lab recommends wet ice, cool your samples with ice in Ziploc baggies.
- If your lab recommends the use of ice packs, freeze the ice packs for at least 72 hours prior to sampling. Do not sample until ice packs are frozen solid.
- Place temperature blanks near the ice. Do not place temperature blanks along the edges of the cooler away from ice or in the top of the cooler.
- Consider taping around the cooler lid to seal in moisture. Leaky coolers can be discarded by shipping couriers.
- Ship samples to the lab as soon as they are collected.
- Refrigerate all bottles if unable to pack and ship immediately, keeping in mind that this may not be an option for samples that have short hold times.

Questions?

If you have any questions, please contact Kendra Morrison at morrison.kendra@epa.gov or (303) 312-6145, or Laura Hult at hult.laura@epa.gov.

Initial Monitoring Required in 2026 for the PFAS National Primary Drinking Water Regulation

The per- and polyfluoroalkyl substances (PFAS) national primary drinking water regulation, or PFAS Rule, became effective June 25, 2024. The regulation, promulgated in 40 CFR § 141 Subpart Z, establishes maximum contaminant levels (MCLs) for six PFAS, and requires monitoring, reporting, and compliance to protect consumers from these chemicals. The rule requires community water systems and nontransient noncommunity water systems to conduct initial monitoring at all entry points to the distribution system for six PFAS by April 26, 2027. These six PFAS are perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide dimer acid (HFPO-DA, also known as GenX Chemicals), and perfluorobutane sulfonic acid (PFBS).

The EPA emailed letters to administrative contacts and operators at public water systems subject to the rule on September 30 (Wyoming systems) and December 12 (Tribal systems). The letters provided information about the initial monitoring requirements, the EPA's evaluation of existing PFAS results, instructions to view 2026 PFAS schedules in Drinking Water Watch, laboratories that must analyze these samples, and monitoring and technical assistance resources. An article on questions and answers about the PFAS Rule was also provided with the notifications.

The results of initial monitoring will be used by the EPA to determine the compliance (routine) monitoring frequency, which will begin in April 2027 and will be ongoing thereafter [40 CFR § 141.902(b)(2)(i)]. Therefore, it is important for operators to collect these initial samples so that the drinking water system they manage can potentially qualify for reduced monitoring in early 2027. If any initial monitoring samples are missed, quarterly monitoring will be required in early 2027.

For additional information and guidance, please contact Kendra Morrison at morrison.kendra@epa.gov or (303) 312-6145

Managing the Replacement of Asbestos Cement Pipe

The use of asbestos cement (AC) pipe (or transite pipe) in drinking water distribution systems was once common in the U.S. It was installed as early as the 1930s with the peak of installation and use between the 1950s and 1960s. The EPA estimates that 15% of water distribution pipes are asbestos cement. Due to the serious health risks associated with asbestos exposure, the EPA attempted to ban all asbestos-containing products on the market in 1989. While that was ultimately overturned, the use of AC pipe was largely discontinued at the end of the last century due to health concerns associated with the manufacturing process and the possible release of asbestos fibers from deteriorated pipes. In 2019, the EPA promulgated a Significant New Use Rule under the

Toxic Substances Control Act to ensure that any discontinued uses of asbestos cannot re-enter the marketplace without EPA review, including asbestos cement pipe and fittings.

Much of our drinking water infrastructure has reached or is nearing the end of its useful life and approaching the age at which it needs to be replaced. AC pipe has a typical design life of 50 years. As AC pipes are managed and replaced, special care is required to prevent the release of hazardous asbestos fibers.

The Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, subpart M, sets forth requirements intended to minimize the release of asbestos fibers during renovation and demolition activities involving the handling of asbestos. Pipe replacement is considered a renovation activity which is subject to these requirements.

Prior to the renovation or demolition of a facility, including activities involving AC pipe, the Asbestos NESHAP requires the removal of all regulated asbestos-containing material (RACM). RACM includes any existing friable asbestos material or material which would likely become friable during the course of the planned demolition or renovation operations. That is, any asbestos-containing material that can be crumbled or reduced to powder by hand pressure must be safely removed prior to conducting activities that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.

Conventional and acceptable work practices to replace AC pipe include open-cut trench and abandonment in place. Open trenching is the practice under which the entire AC pipe is excavated, wet-cut into 6- and 8-foot sections using a snap cutter or similar tool, wrapped for containment, and removed for disposition at an approved disposal location. Asbestos cement pipes may also be abandoned in place with the new pipeline laid in a separate area.

While pipe bursting and breaking are popular methods for various types of pipe replacement projects in general, pipe bursting or breaking AC pipe is not permitted under the Asbestos NESHAP. Pipe bursting or breaking of AC pipe renders the AC pipe friable, leaving friable pipe fragments consisting of RACM underground. This method does not comply with the requirements of the asbestos NESHAP and has not been approved by the EPA.

The EPA has approved a closed-trench method for AC pipe replacement, which may be used as an alternative to the open-cut trench and abandonment in place approaches allowed under the Asbestos NESHAP. This EPA-approved alternative work practice standard is known as Close Tolerance Pipe Slurrification (CTPS). CTPS utilizes trenchless technology and does not leave friable asbestos in the ground. CTPS involves grinding the AC pipe while simultaneously injecting fluid to form a liquid cement slurry which is vacuumed out through vertical access points. The new pipe is pulled into the existing pipe cavity directly behind the grinding apparatus. A skim coat of nonfriable cementitious asbestos-containing material is left and solidifies on the outside rim of the new pipe. See here for more information on the CTPS method. See here for more information about the asbestos NESHAP.

If you have any questions, please contact the Chemical Phase II/V Rule Manager Kendra Morrison, at morrison.kendra@epa.gov or (303) 312-6145.

Photo credit: Colorado Hazard Control, LLC

Service Line Inventory and Replacements for Wyoming Systems

On October 8, 2024, the EPA issued the final Lead and Copper Rule Improvements (LCRI) to significantly reduce exposure to lead through drinking water. The Final LCRI replaces most of the 2021 LCRR but keeps and requires systems to continue to comply with 1) the previous compliance date of October 16, 2024, for the initial inventory (including making it publicly accessible), and 2) the notification of service line material and its corresponding certification between October 16, 2024, and November 1, 2027. All Community and nontransient noncommunity water systems must comply with the rest of the LCRI service line inventory and replacement requirements by November 1, 2027.

What NEW Service Line Inventory and Replacement Requirements are due next?

- **Baseline Inventory – *Due by November 1, 2027***

All water systems must develop an updated initial service line inventory, called the LCRI baseline inventory. It must include information identified on connectors as well as any updated or new information on service line materials and locations. Systems must review specified sources of information for connector materials and categorize them as "Lead," "Non-lead," "Unknown," or "No connector present" where there is no connector at the location.

- **Service Line Replacement Plan Requirements – *Due by November 1, 2027***

A service line replacement plan is required for any water system with at least one lead, GRR, or unknown service line in its baseline inventory. This plan can help the water system implement their service line replacement program effectively. The service line replacement plan must be sufficiently detailed to ensure the system is able to comply with all LCRI service line inventory and replacement requirements.

ANNOUNCEMENT: The EPA Region 8 Service Line Inventory and Replacement Policy

EPA Region 8 has developed a policy for the direct implementation of the Lead and Copper Rule, specifically for the service line inventory and replacement (LSLR) requirements where certain water system flexibilities are allowed. This policy provides guidance for water systems in Wyoming on the use of these flexibilities.

The final Lead and Copper Rule Improvements (LCRI) require water systems to review and use certain sources of information to identify service line materials in the inventory. The LCRI also permits water systems flexibility to also use "other" sources of information for identifying service line materials in the inventory if approved by the Primacy Agency. "Other" sources of information can include evidence-based records, methods, and/or techniques not listed under the LCRI required information sources. EPA Region 8's LSLR policy establishes the EPA Region 8 pre-approved "other" sources of information water systems may use and provides guidance on the guidelines required for using them.

- EPA Region 8 Service Line Inventory and Replacement Policy (pdf)

STAY INFORMED: The EPA Region 8 Lead Service Line Inventory and Replacement Webpage

Keep up to date with the latest information from EPA Region 8 on the Service Line Inventory and Replacement requirements by visiting EPA Region 8 LSLR webpage. We suggest you bookmark it in your internet browser. The website is part of the EPA Region 8 Drinking Water Operations (WaterOps) webpage, where information on LSLR reporting forms, consumer notification templates, technical assistance resources, EPA Region 8 LSLR Policy, technical fact sheets, rule guidance materials, and more can also be found.

- EPA Region 8 - Service Line Inventory and Replacements for Wyoming Water Systems

For more information on the Lead Service Line Inventory and Replacement regulatory requirements and PWS resources, you can visit the following webpages managed by the US EPA Office of Ground Water and Drinking Water:

- Lead and Copper Rule Implementation Tools
- Lead Service Lines
- Lead and Copper Rule Improvements

- LCRI Technical Fact Sheets and Other Supporting Materials

Contact: Erica Wenzel, wenzel.erica@epa.gov Lead Service Line Inventories and Replacement – Wyoming

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Update on Service Line Inventories and Next Steps for Tribal Water Systems

The Lead and Copper Rule (LCR), finalized in 1991, requires actions by water systems to reduce levels of lead and copper in drinking water.

Under the Lead and Copper Rule Revisions (LCRR), all community and nontransient, noncommunity water systems are required to:

- Develop and submit an initial service line inventory, which was due October 16, 2024.
- Make their service line inventory publicly accessible beginning November 16, 2024.
- Provide *annual* notification of service line material and required public education to persons served by lead, galvanized requiring replacement, and lead status unknown service lines by the end of the calendar year. These service lines are also referred to as known or potential lead service lines. The 2026 annual notifications must be delivered by December 31, 2026.
- Provide *annual* certification to the EPA that annual notifications of known or potential lead service lines for the previous year were delivered, along with a copy of the notification delivered. Certification is due on July 1. Certification that the 2025 notifications were delivered must be sent to the EPA by July 1, 2026.

The EPA has a technical assistance contract in place with OCH JV to provide free technical assistance to eligible water systems or portions of water systems in Region 8 Indian Country to meet service line inventory requirements. Many water systems worked with OCH JV on their initial service line inventories, and more are working with OCH JV to update their inventories, to include field activities. A few Tribes have applied for a Direct Grant to support work on service line inventories. The EPA and OCH JV are currently conducting in-person Lead Service Line Inventory Informational Meetings with Tribal leaders and utilities to discuss the following: 1) work completed to date; 2) planning field activities, including inspections and potholing; 3) planning public outreach and community engagement; and 4) EPA technical assistance and funding for this work. To date, the EPA and OCH JV have held nine Informational Meetings, and Informational Meetings with remaining Tribes and water systems will be scheduled through May 2026.

Looking ahead, the final Lead and Copper Rule Improvements (LCRI) include additional service line inventory requirements, due November 1, 2027. These additional requirements include:

- Develop and submit to the EPA an updated service line inventory, called the “baseline” inventory, that includes information on connectors as well as any updated or new information on service line materials and locations, due November 1, 2027.

- Develop and submit a Lead Service Line Replacement Plan, due November 1, 2027. The EPA has a fact sheet detailing requirements of a Lead Service Line Replacement Plan.

To support field activities such as inspections and potholing, to verify unknown service lines and validate non-lead service lines, EPA Region 8 has developed a policy which provides guidance for water systems in Wyoming and Indian Country that EPA Region 8 directly regulates. The LCRI permits water systems flexibility to use "other" sources of information for identifying service line materials, if the use of those "other" sources is approved by the State (i.e., the EPA for water systems in Wyoming and Region 8 Indian Country). This policy provides guidance on an EPA Region 8-approved "other" source of information, a statistical approach for verifying unknown and validating certain non-lead service lines. This statistical approach is an effective and efficient way to address unknowns and complete service line inventories.

In summary, during 2026, next steps are to: 1) provide certification to the EPA by July 1, 2026, that 2025 notifications were delivered; 2) deliver the 2026 notifications by December 31, 2026; and 3) continue to work on updating service line inventories, focusing on ensuring a complete accounting of all service lines and reducing the number of lead status unknown service lines. Information and resources available to assist you with these actions are listed below:

- EPA Region 8's Lead Service Line Inventories in Wyoming and on Tribal Lands in EPA Region 8 is on the main webpage.
- EPA Region 8's new policy on direct implementation of the LCRI, including "other" sources of information, is now posted on the main webpage for Lead Service Line Inventories (see above link).
- Click here for Information on the LCRI, including EPA technical fact sheets on Service Line Inventory and Replacement Requirements (includes Lead Service Line Replacement Plans) and Inventory Validation.
- For more information on EPA Region 8's technical assistance contract with OCH JV, see the main webpage above and also here. You can also reach out directly to OCH JV at TribalCommunityLSLI@jactobs.com.
- For more information on EPA Region 8's Tribal Drinking Water Infrastructure Direct Grant Program, go to this location.
- Template forms for *Notification of Known or Potential Lead Service Lines* and *Certification of Annual LSL Consumer Notification* can be found on the EPA Region 8's Reporting Forms webpage under Lead Service Line Inventory.

Contact: Jill Minter, minter.jill@epa.gov

Lead Service Line Inventories and Replacement – Tribal

Photo Credit - Lucienne Gassie

Storage Tank Requirements

Drinking water storage tanks are arguably the most vulnerable element in a water system, as storage at atmospheric pressure increases the risk of microbiological, chemical, or physical contamination before the water can be used. Access points, such as hatches, sidewall joints, vents, overflows and drain piping can allow contaminants to enter the tank. Further, infrequent tank cleaning and inspection can cause sediment buildup at the bottom of the tank. This extra sediment increases the risk of microbial growth, disinfectant demand, unwanted by-product formation, and bulk water turbidity. Additionally, system security is a growing concern. It is important to prevent trespassing, vandalism, and sabotage. Unauthorized people should not be able to access the inside of any drinking water tanks.

At each sanitary survey, the EPA evaluates storage tanks, their components and their inspection or cleaning history. During the sanitary survey, the surveyor will ask to review the system's latest tank Inspection Report, discussed below. The surveyor will physically evaluate all essential components of your storage tanks for integrity and watertightness. Tank components must be accessible for inspection, or you must provide adequate and descriptive pictures dated within a year of the sanitary survey site visit. All openings must be protected with downward-facing or shrouded #24 noncorrodible mesh screens or permanent watertight seals, such as grommets or bulkhead fittings. Caulking/tape/glue/sealant is not acceptable.

Self-Inspection and Cleaning

For all public water systems, EPA Region 8 requires that each tank be inspected and cleaned, if needed, every ten years. A written inspection report must be generated and provided to the sanitary surveyor. Regardless of who does the inspection, the report should include:

- Cleaning date and method, if cleaned
- Sediment depth, if cleaned

- Record of debris, insects or other animals found
- Disinfection method
- Foundation or tank integrity issues
- Any corrosion, leaks, or holes.

It should be accompanied by a summary of any issues found, pictures of each step of the process, and a completed EPA Region 8 Drinking Water Unit Finished Water Storage Tank Checklist - available on the EPA Region 8 website.

EPA Region 8 recommends tanks be cleaned using the American Water Works (AWWA) procedure C652. For Wyoming water systems, Wyoming State Standards Chapters 10 and 12 *require* that storage tanks be cleaned using this method. This procedure has three chlorination methods to choose from to drain and clean a tank: 1. Chlorinating while filling the tank, 2. Spraying and painting the emptied tank with a chlorine solution, or 3. Chlorinating the tank bottom and then filling to overflow level with chlorinated water. Method details are available here. If using divers instead, the dive team must be fully trained in confined space entry and first aid, and divers must be fully covered. The tank should be isolated from the water system, and the entry access area, including the tank hatch, must be fully cleaned and disinfected. All equipment and personnel going into the tank must be disinfected immediately prior to entry. Further details on requirements for divers are also included in the above link.

Indoor Tanks

EPA Region 8 recognizes that the risks are different for tanks that are inside a building compared to those outside and exposed to the elements. A tank may be considered an indoor tank if it is inside a building which has no openings in the roof and walls that could allow organisms, rain, snow, or wind to enter it, and there is no sunlight access to the tank through windows.

Because of limited space, but greater protection, an indoor tank's downturned air vent can terminate as low as eight inches above the tank roof, instead of the 24 inches required for an outdoor tank. Indoor tank hatches do not have to be shoebox, and the EPA will accept a screw-on or bolted hatch if it has a neoprene gasket. There is no minimum height requirement, unless the tank is completely buried, and the hatch is built into the building floor. In this case, the hatch must be at least four inches above the floor to prevent spills from pooling on it. Recessed hatches are allowed, and a false tank hatch does not have to be shoebox if it is watertight.

Water must not pool in any storage tank overflow area. If the tank and its overflow are indoors, the overflow must be designed so that an overflow event will not damage electrical or other vulnerable components in the building through splashing or flooding. It must terminate 12-24 inches above the floor or splash plate, and the water must be routed outside, where it must meet the same criteria as an outdoor tank overflow.

Outdoor Tanks

Outdoor tanks must be protected to the elevation of the 100-year or maximum-known flood, or the hatch, vent, and overflow must be 36 inches above the highest flood elevation. Sewers, drains, standing water, and similar contamination risks must be at least 50 feet from the structure. Because they are subject to sunlight, these tanks must be opaque to prevent algal growth. Hatches must terminate at least four inches above the roof of the tan, and at least 24 inches above natural ground level. An outdoor tank with a false hatch may not require a shoebox lid on the tank itself, but the secondary outer hatch must be shoebox

and must prevent organisms and wind- and rain-carried debris from getting into the space between hatches.

This is a quick summary of some of the elements the surveyor will be considering at your next Sanitary Survey. The EPA has recently updated the inspection checklist (link above) and the tech tips to provide additional clarity on storage tank requirements. For more detailed information on requirements for tank components, visit the EPA Region 8 webpage.

Change Form Requirements

My system has had changes. What do I do?

System changes can happen frequently, whether it is new staff, staff leaving, contact information, a new well, or treatment. When these changes occur, while it is helpful to let us know via email or phone call, a completed Change Form will need to be submitted to **R8DWU@epa.gov**. It is important that the Change Form be complete, as no changes will be made without a completed form. Keep in mind that not all sections of the Change Form will apply to your system. The Change Forms can be found here. We will verify smaller changes via email to mendrala.angela@epa.gov or phone call to 303-312-6533. If you have any questions, we are glad to help and guide you through the form as you complete it.

Tier 1 Public Notice for Lead Action Level Exceedances

An exceedance of the lead Action Level now requires public water systems to perform a Tier 1 Public Notice (PN) within 24 hours of the system learning of the lead Action Level Exceedance (ALE). The current Action Level for lead will remain at 0.015 mg/L through 2026 and into 2027. In addition, first-liter, first-draw samples are required through the

upcoming 2026 calendar year. More information regarding the reduction of the lead action level from 0.015 mg/L to 0.010 mg/L and the requirement to collect first- and fifth-liter samples will be included in next year's newsletter.

If a water system learns of a lead ALE, they must notify the ALE rule manager, Chelsea Ransom, at ransom.chelsea@epa.gov **and** 303-312-6876, immediately. Next, follow the instructions for filling out and distributing the Tier 1 PN (do not wait for a response from the EPA). The instructions, template, and certification can be found on our website in Word and pdf formats in English and Spanish at this location.

.Due to the tight time constraint, the EPA does not need to preapprove the Tier 1 PN template before it is distributed. The Public Notice needs to be submitted to the EPA within 24 hours of learning of the exceedance. The certification that it was distributed must be sent to the EPA within 10 days of completion. **If a system fails to complete the Tier 1 PN within 24 hours of learning of the ALE, the EPA is required to issue a public notification on behalf of the water system.** EPA Region 8 would do this as a public service announcement in the media.

Lead and Copper Tap Sample Site Plan (TSSP) Development

Summary:

- Develop a lead and copper site sample plan
- Submit to the EPA for review and approval
- Sample according to the Tap Sample Site Plan (TSSP) during your monitoring period
- If you cannot sample according to the TSSP – **EMAIL THE EPA BEFORE** sampling to obtain approval

Where Must I Collect My Samples?

The lead and copper regulations (LCR) require you to sample at locations that may be particularly susceptible to high lead or copper concentrations. The LCR establishes a tiering system for prioritizing sampling sites. A materials evaluation is required to help classify sampling sites into tiers. Region 8 requires that water systems develop a Lead and Copper Sample Site Plan before you begin your lead and copper tap monitoring. You can develop or update an existing sample site plan using the LCR Tap Sample Site Plan Instructions page along with the blank sample site plan form. The monitoring must be conducted at taps that can be used for human consumption (e.g., kitchen or bathroom taps). The Tiering Classification table below defines the tiering system for prioritizing sampling sites. (40 CFR 141.86(a)).

Tiering Classification	
If you are a Community Water System (CWS)	***If you are a Non-Transient Non-Community Water System (NTNC)***
Tier I sampling sites are single family structures: • with copper pipes with lead solder installed after 1982 *(but before the effective date of your state's lead ban)* or contain lead pipes; and/or • that are served by a lead service line. **Note:** When multiple-family residences (MFRs) comprise at least 20% of the structures served by a water system, the system may count them as Tier 1 sites.	**Tier I** sampling sites consist of buildings: • with copper pipes with lead solder installed after 1982 *(but before the effective date of your state's lead ban)* or contain lead pipes; and/or • that are served by a lead service line.
Tier 2 sampling sites consist of buildings, including MFRs: • with copper pipes with lead solder installed after 1982 *(but before effective date of your state's lead ban)* or contain lead pipes; and/or • that are served by a lead service line.	**Tier 2** sampling sites consist of buildings with copper pipes with lead solder installed before 1983.
Tier 3 sampling sites are single-family structures with copper pipes having lead solder installed before 1983.	**Tier 3**: Not applicable.
Representative Sample: If a CWS or NTNCWS cannot collect enough samples from tiered sites, it must collect them from sites where the plumbing is similar to that used at other sites served by the water system.	

Once monitoring begins, you must use the same sites, unless a site is no longer accessible to you or no longer fits the requirements of a priority site (e.g., the lead service lines that served the site have been removed). Sites chosen for reduced monitoring (i.e., monitoring that is conducted at a one-year or three-year frequency) must be representative of those sites that were used during standard monitoring and must follow tiering requirements. For example, if a system has 100 sites, of which 75 are Tier 1 and 25 are Tier 2, it must collect all 50 reduced sites from Tier 1 sites if they are available. Otherwise, the rule does not specify which sites must be chosen for reduced monitoring. You may wish to randomly select the reduced number of sites from the larger pool used during standard monitoring. The intent of the rule is that you do not use only those sampling locations with the lowest lead or copper levels. Region 8 may determine which sample locations you must use. Before proceeding, check with the lead and copper rule program at Region 8 to find out what method the region uses in selecting reduced monitoring sampling sites.

Sources of Information That You Should Review

To identify enough sites that meet the tiering criteria, you should survey all records documenting the materials used to construct and repair your distribution system and buildings connected to your distribution system. Relevant information can be attained through the following sources:

- Plumbing Codes

- Plumbing Permits
- Distribution Maps and Drawings
- Inspection and Maintenance Records
- Meter Installation Records
- Capital Improvement and Master Plans
- Standard Operating Procedures
- Operation and Maintenance Manuals
- Permits
- Existing Water Quality Data
- Interviews with Senior Personnel, Building Inspectors, and Retirees
- Community Survey

The EPA recommends that you identify more sampling sites than the number of samples you are required to collect during each monitoring period in case volunteers drop out. The region will determine the number of lead and copper samples required. It is best to identify at least double the number of sites meeting the Tier 1 criteria, if available in your distribution. Then you should complete your list with sites meeting Tier 2 criteria, if available, followed by those meeting Tier 3 criteria, if available (for CWSs only).

- If you do not have enough Tier 1, 2, and 3 sites, you must complete your sampling pool with representative sites. A site is representative if its plumbing is similar to that of other sites in your system. The EPA encourages you to use sites with copper plumbing installed after the local implementation of the lead ban (typically 1988 or 1989), provided these sites can be considered representative.

- If your system has fewer than five drinking water taps, then you must collect at least one sample from each tap and additional samples from those taps on different days during the monitoring period to meet the minimum number of required samples. For instance, if you have only one sample site, you may be required to collect five separate samples from that sample site on different days. Alternatively, under the Short-Term Revisions, the region may allow you to collect fewer than five tap samples if you collect samples from all taps that can be used for human consumption (e.g., kitchen or bathroom taps).

- If your system contains lead service lines, then, if possible, half of the required sampling sites should be served by a lead service line. For example, for a system required to collect 40 tap samples, your sampling plan should include 20 sites that are served by a lead service line, if available, and you should try to maintain a list of about 30 to 40 sampling sites served by lead service lines to ensure access to enough sites.

If You Cannot Find Enough Tier 1 Sampling Sites

If you are unable to collect all your samples from Tier 1 sites, then you must follow the procedures discussed below and notify Region 8 of any deviation from your sample site plan:

- When a sufficient number of Tier 1 sites do not exist or are inaccessible (e.g., homeowner denies permission for you to collect a sample), you must complete your sampling pool with Tier 2 sites.
- For CWSs, when a sufficient number of Tier 1 and 2 sites do not exist or are inaccessible, you must complete your sampling pool with Tier 3 sites.
- Any water system that cannot complete its sampling at sites that meet the applicable tier criteria must complete sampling at representative sites throughout the distribution system.
- You are not required to target buildings with lead solder installed after the effective date that the lead ban was adopted in your state.
- You should not monitor at sampling sites that have water softeners; however, if all of your available sampling sites have water softeners, you should identify the highest risk sites (Tier 1) and monitor at those locations (such as a kitchen or bathroom tap).
- If you are not able to draw at least half of your samples from taps served by lead service lines, you must collect a sample from each *available* site that is served by a lead service line.
- If you have no lead service lines, but you have lead goosenecks or pigtails, you can collect tap water samples at the sites with goosenecks and/or pigtails.

If You Cannot Use an Original Sampling Site:

If you cannot gain access to an original sampling site during any subsequent monitoring period (e.g., homeowner no longer wishes to participate in the sampling program), you must notify the Region 8 lead and copper rule manager, update your sample site plan, and collect a tap water sample from another site which meets the same targeting criteria as the original site. The replacement site should be located within reasonable proximity of the original site. (*Note: Region 8 requires prior notification or approval of any changes in sampling sites, and you must report any sampling site changes when submitting data*).

Questions?

If you have any questions, please contact Bolor Bertelmann at bertelmann.bolor@epa.gov or (303) 312-6233.

Consumer Confidence Report Rule

- If your system has fewer than five drinking water taps, then you must collect at least one sample from each tap and additional samples from those taps on different days

during the monitoring period to meet the minimum number of required samples. For instance, if you have only one sample site, you may be required to collect five separate samples from that sample site on different days. Alternatively, under the Short-Term Revisions, the region may allow you to collect fewer than five tap samples if you collect samples from all taps that can be used for human consumption (e.g., kitchen or bathroom taps).

- If your system contains lead service lines, then, if possible, half of the required sampling sites should be served by a lead service line. For example, for a system required to collect 40 tap samples, your sampling plan should include 20 sites that are served by a lead service line, if available, and you should try to maintain a list of about 30 to 40 sampling sites served by lead service lines to ensure access to enough sites.

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- For CWSs, when a sufficient number of Tier 1 and 2 sites do not exist or are inaccessible, you must complete your sampling pool with Tier 3 sites.

- Any water system that cannot complete its sampling at sites that meet the applicable tier criteria must complete sampling at representative sites throughout the distribution system.

- You are not required to target buildings with lead solder installed after the effective date that the lead ban was adopted in your state.

- You should not monitor at sampling sites that have water softeners; however, if all of your available sampling sites have water softeners, you should identify the highest risk sites (Tier 1) and monitor at those locations (such as a kitchen or bathroom tap).

- If you are not able to draw at least half of your samples from taps served by lead service lines, you must collect a sample from each *available* site that is served by a lead service line.

- If you have no lead service lines, but you have lead goosenecks or pigtails, you can collect tap water samples at the sites with goosenecks and/or pigtails.

If You Cannot Use an Original Sampling Site:

If you cannot gain access to an original sampling site during any subsequent monitoring period (e.g., homeowner no longer wishes to participate in the sampling program), you must notify the Region 8 lead and copper rule manager, update your sample site plan, and collect a tap water sample from another site which meets the same targeting criteria as the original site. The replacement site should be located within reasonable proximity of the original site. (*Note: Region 8 requires prior notification or approval of any*

changes in sampling sites, and you must report any sampling site changes when submitting data).

Questions?

If you have any questions, please contact Bolor Bertelmann at bertelmann.bolor@epa.gov or (303) 312-6233.

What's in a Sample Bottle Label Name?

The way you label your water samples tells the EPA a lot about the sample. It also determines whether your sample results will be credited to your water system or if you end up with a monitoring violation when the correct sampling location is not clearly indicated. This article will explain how to correctly label your samples so that you get the credit you deserve and do not sample in vain!

Please note, the following article discusses labeling requirements **only** for total coliform, nitrate-nitrite and triggered Ground Water Rule (TG GWR) samples. The information is applicable to almost all public water systems (PWSs). This article does not include directions on how to label samples for lead, copper, disinfection byproducts, chemicals, asbestos, radionuclides, or any other parameters that may be required.

The contaminant sample point needs to be written on the sample bottle label and the lab form. To locate the sample points for total coliform and source sample, look at your RTCR Sample Siting Plan that was submitted to the EPA. To locate the sample point for nitrate, please refer to the Annual Monitoring and Reporting Requirements ("To Do" lists) and "schematic" of your water system which the EPA sends out every year around mid-February. The schematic is an overly simplified, not-to-scale diagram of your water system. Instead of showing individual buildings and streets as your distribution system, it has a large pound sign or hashtag, that looks like this #. There is also at least one red star and blue arrow indicating where a sample should be collected for Nitrate-Nitrite, other Inorganic Compounds (IOCs), Synthetic Organic Compounds (SOCs), Volatile Organic Compounds (VOCs) and Radionuclides (RADS) (if required). In most cases, this is NOT the sampling point for total coliform. There is a note on the schematic that says, "Sample Points (SP) shown on the schematic are **ONLY** for Nitrates, RADs, IOCs, SOCs and VOCs." If you sample for total coliform or other contaminants, please refer to your individual Site Sampling or Monitoring Plans.

Nitrate/Nitrite Monitoring Location

Please refer to your "Monitoring and Reporting Requirements," also referred to as "ToDos," when you begin planning to sample for nitrate or nitrite. The schematic for your system indicates the facility ID and the sample point where the sample must be collected with a description of the sample point location (i.e., storage tank). Some examples of the facility ID include SS01, PF01 or ST01. Sample point examples include SP01 or SP02. The SPxx designation tells the EPA that a water sample was collected AFTER any water treatment processes and BEFORE it gets to the first consumer and is from the location we call "the entry point to the distribution system." You may have more than one sampling point for nitrate-nitrite due to the number of entry points to the distribution system representing separate sources of water. If your system is required to sample for nitrate-nitrite per your Monitoring and Reporting Requirements, the sampling point on the

schematic is marked as SPxx (i.e., SP01 or SP04) with a description of the sample point location (i.e., storage tank).

It is important to use a certified lab of your choice to analyze the samples. A current list of certified labs in Region 8 can be found here. It is the PWS's responsibility to make sure that the lab analyzing your sample(s) for compliance is State or EPA certified for the specific analyte and method being requested.

When collecting the compliance sample, please be careful to label the sample bottle to match your facility ID and the sample point as the EPA database will only accept samples labeled this way for nitrate-nitrite, other IOCs, SOCs, VOCs and radionuclides. Make sure the sampling point and sample point description (the SPxx number previously mentioned) is clearly noted on the lab's chain of custody or other form that is submitted with your water sample(s). This will ensure that the sample result is accurately recorded in the EPA database as a sample for compliance. Without the correct sample point location, your PWS will get a nitrate-nitrite failure to monitor (FTM) violation.

Total Coliform Monitoring Location

Total coliform water sample(s) must be labeled with a sample location name that clearly indicates that it is in the distribution system, preferably with the letters "DIST" and the location listed on the Revised Total Coliform Rule (RTCR) Sample Siting Plan. For example, "men's restroom-DIST" or "DIST 123 Main St." Total coliform samples must be collected within the distribution system where the water is used (not at a storage tank or pump house). If you write on your sample bottle or laboratory chain of custody form that a total coliform sample was collected at SPxx, the sample will be rejected by the database, and a total coliform failure to monitor (FTM) violation will be issued.

Ground Water Rule (GWR) (Source) Monitoring Locations

If your water source is a well or spring, you are required to collect a groundwater source sample at the well or spring if your PWS has a *routine* RTCR total coliform or *E. coli* positive (TC+ or EC+) result and the system doesn't have treatment that achieves 4-log virus inactivation and removal. Samples must be collected from all groundwater sources that were used when the *routine* RTCR TC+ sample was collected, and they must be analyzed for total coliforms and *E. coli*. If you have a surface water source, this requirement does not apply to your PWS. If you purchase water from another system, you must notify the PWS that you purchase water from so that they can take the source water sample to meet the Triggered GWR sampling requirement.

Collect the source sample(s) at the groundwater source(s) (well or spring) BEFORE any treatment. You are required to have a designated sample tap at a location that allows testing from the water source. If there is no sample tap on each of your well(s) or springs, you will need to install one before your next sanitary survey, as it will be considered a Significant Deficiency in most cases where a source sample tap is absent. If you must collect GWR source samples within 24 hours after a routine RTCR TC+ or EC+ sample and you do not yet have a sample tap for your untreated groundwater source(s), then you may be able to collect the source sample from the faucet or tank inlet closest to the well and then install a more appropriate sample tap at the source afterwards. If you do not yet have a tap at each source, and your groundwater sources combine before treatment, you may take a combined source sample, but make sure to mark the sample location as "combined" and note the groundwater sources' facility codes that were combined (e.g., Combined WL01, WL02, and SPR01). This sample must be labeled as the Triggered Ground Water Rule sample (or "TG GWR" for short). You must indicate that it is a source sample or collected

from the well or spring so that the EPA knows it is not one of the required RTCR repeat samples from the distribution system. Remember: This sample is only required if you use groundwater for your source water and have a routine total coliform or *E. coli* positive result.

What if SPxx and/or DIST and/or TG GWR are the same location?

What if your PWS does not have a way to collect a sample from the source (for the TG GWR) or from the entry point to the distribution system (for the SPxx for nitrate/nitrite)? Please discuss this situation with the EPA, and the EPA may designate the first tap within the distribution system as the sampling location for all three water samples, the TG GWR, the nitrate-nitrite and the routine total coliform sample. If this is the case, you will need to remember to label each sample bottle differently according to the naming conventions described above. Even though the sample location is the same, the EPA database will not accept samples that are labeled improperly.

If a nitrate-nitrite sample is labeled "DIST" (from the distribution system), you will get a nitrate monitoring violation. If the water sample from the same location is labeled "TG GWR," and you intended it to be a routine total coliform sample, it will not be accepted, and a total coliform monitoring violation will be issued. If a total coliform sample is labeled "SPxx," you will get a total coliform monitoring violation since the database will think the total coliform sample was collected from the entry point to the distribution system and not from within the distribution system. Although it sounds confusing, if you print out your Annual Monitoring and Reporting Requirements, and keep the form(s) with the correct sample point code(s) with your sample bottles, then you can always refer to it for the proper way to label your samples. We also recommend keeping your RTCR Sample Siting Plan close by so you remember where to collect your sample(s) each month with the proper sample naming convention to write on your sample bottles and laboratory chain of custody.

EPA Regulation	Contaminant Analyzed	Physical Sample Location	Sample Site Name
Nitrate-Nitrite Rule	Nitrate, Nitrite, or Nitrate-Nitrite	Entry point to the distribution system, after treatment*	Example: SP01 – Storage tank/SP04 – pressure tank
Revised Total Coliform Rule	Total Coliform and E. *coli*	Within the distribution system*	Example: DIST – Men's restroom or DIST - 123 Main Street
Ground Water Rule	E. *coli*	Directly from the well or spring, before treatment*	Example: TG GWR – WL01 - source

*If the sample location is the same for all three regulations, please collect your samples and label bottle according to the naming convention above.

Photo credit: Lucienne Gassie

EPA Region 8
Mountains and Plains

Serving Colorado, Montana, North Dakota,
South Dakota, Utah, Wyoming and 28 Tribal Nations

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