

GROUND WATER RULE

ADH Compliance Short School

The GROUND WATER RULE (GWR) Overview

- Applies to all Public Water Systems (PWS) serving ground water
- Wholesale systems supplying ground water
- Consecutive systems buying ground water
- Mixed systems using both ground water and surface water not combined
- Does not apply to systems who combine all their ground water with surface water (or groundwater under the influence of surface water) prior to treatment meeting Subpart H (Surface Water Treatment Rule)

The GROUND WATER RULE (GWR) Overview

Purpose:

Provides an additional barrier from microbial contamination and from pathogens entering drinking water by correcting deficiencies identified in the sanitary survey

Examples: well defects, sources of contamination, water treatment plant (WTP) defects



GWR COMPONENTS

- 1. Triggered Monitoring (triggered by total coliform positive (TCP) distribution sample collected as part of routine monitoring)
- 2. Compliance Monitoring
- 3. Sanitary Surveys
- 4. Corrective Action Plan
- 5. Source Water Assessment Monitoring (State option)



GWR COMPLIANCE STRATEGIES

- Triggered source water monitoring
- Compliance Monitoring Treatment to 4 log (99.99%) inactivation and/or removal of viruses

Most water system in Arkansas comply with the Ground Water Rule by performing triggered source water sampling when a positive coliform sample result is obtained during routine monthly monitoring. A small number of water systems comply through ensuring and documenting adequacy of the disinfection process (4 log viral removal/inactivation).



- Triggered by a TCP Routine sample under the Revised Total Coliform Rule (RTCR).
 - 1 sample from each source collected within 24 hours of notification
 - Applies to wholesale & purchase systems, too.
- Applies to all GWR systems that do not provide 4-log inactivation or removal of viruses.



- If a purchase system gets a TCP, it must notify the source system so that they will be aware of the possible need to perform source water sampling per federal regulations.
- However, in Arkansas, most purchase systems have master meters that are far enough from the source system treatment that 4-log virus inactivation has occurred if there is a chlorine residual. This would negate the need for source sampling.
- The ADH will confirm with the source system, if source water sampling is required.



- Consecutive systems (purchase systems)
 - Must advise source system of routine bacteriological positive sample (TCP)
 - Must record chlorine residual on bacteriological sample collection form
 - Must provide public notice if source system has a treatment technique or monitoring violation



- As long as you record your chlorine residual on your bacti sample collection form and on your monthly Bacteriological Monitoring Record (BMR) the source system will likely not be required to collect triggered (raw) water samples from their wells. The ADH will make that decision.
- Distribution systems have been evaluated to determine if the State established criteria has been met.
- If the chlorine residual has not been recorded on the bacti sample collection form or is not present then the source system will be required to collect source water samples.





Arkansas Department of Health

4815 West Markham Street ● Little Rock, Arkansas 72205-3867 ● Telephone (501) 661-2000 Governor Mike Beebe

Paul K, Halverson, DrPH, FACHE, Director and State Health Officer

Engineering Section, Slot H37 www. He althyArkansas.com/eng/ Ph 501-661-2623 Fax 501-661-2032 After Hours Emergency 501-661-2136

Monday, December 07, 2009

ANYTOWN WATERWORKS JOHN SMITH 1905 VIRUS WAY ANYTOWN, AR 72990

RE: GWR Triggered Monitoring

Dear: JOHN SMITH

Example Report:
Routine Distribution TC+ Result –
Triggers Collection of Raw Sample(s)

Your system or a public water system which purchases water from you has had either a total coliform positive result on one or more of the routine monthly distribution system samples collected for compliance with the TCR, or your system has had an E. coli positive raw water sample (see results below).

The **Ground Water Rule** requires that you collect at least one raw water sample either on the combined raw water line <u>prior to treatment</u> at each water treatment plant or from each of your well(s) that were in operation on the date the TCR compliance sample(s) was collected. This notice approves you to monitor at either location. Additionally, if source sample(s) are E. coli positive, additional source monitoring will be required.

BOTTLE(S) ARE BEING SENT TO YOU FOR GROUNDWATER SOURCE SAMPLING

PWS# 999

System Na	ime: A	NYT	OWN WA	TERW	ORKS								
Lab No.	Site		Site Addre	88				County	Collected	Time	Received	Time	Collected By
1014307	999B0		ANYTOWN 1212 H2O		RAL STORE			ARKA	12022009	0900	12032009	0742	J SMITH
Specimen o	ode W	EL	Purpose	REG	Category	PUB	Rejection	Result:		TOTAL CO	OLIFORMS	Present Absent	
Comments:											CI	nlorine R	esidual: 0.3
Actions to	Take:	water	tap on the	combir	ned raw wate	rhead	ater monitoring der prior to trea ere <u>in operatio</u>	atment at each	n of your wal	ter treatme	nt plants or a	a single sar	mple from a
		The s	ample(s) rr	nust be	collected with	hin 24	hours of recei	wing this notic	ю.				

Select the Site Code and Sample Location from the list of your treatment plant(s) and well(s) below: Enter in the "Site Code" box and "Definite Location of Sample" box on the bacti report form exactly as shown.

	Site Code	Location		Site Code	Location
WTP:	99901	WTP #1 (DOWNTOWN)	WELL:	999101	WELL #10A
WTP:			WELL:	999102	WELL #11
WTP:			WELL:	999103	WELL #12A
WTP:			WELL:	999104	WELL #15
WTP:	99902	WTP #2 (MT HOLLY)	WELL:	999201	WELL #17
WTP:			WELL:	999202	WELL #18
WTP:			WELL:	999203	WELL #19
WTP:			WELL:	999204	WELL #20
WTP:	99903	WTP #3 (MORNING STAR)	WELL:	999301	WELL #16 MORNIIG STAR



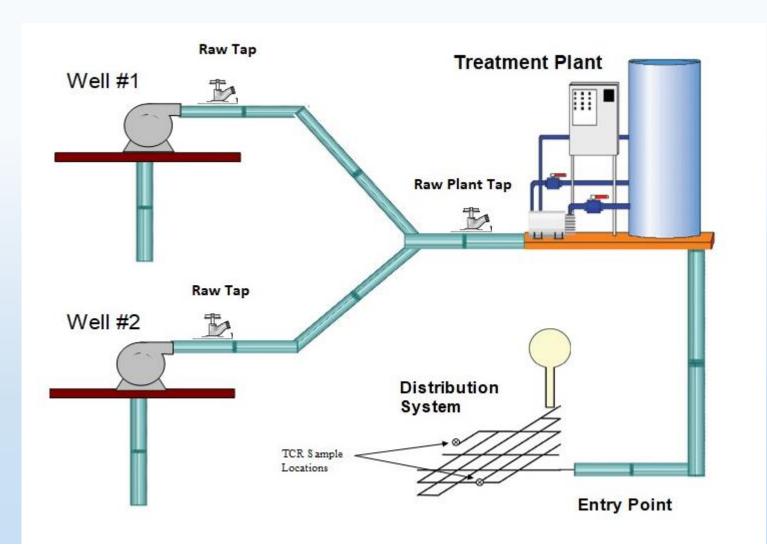
					
WTP:	99901	WTP #1 DOWNTOWN	WELL:	999101	WELL #10A
				999102	WELL #11
				999103	WELL #12A
				999104	WELL #15
	99902	WTP #2 MOUNT HOLL	Y	999201	WELL #17

LOCATION

SITE CODE



LOCATION



IF BOTH WELLS WERE PRODUCING ON DAY OF TCP TAKE FROM COMBINED TAP

IF ONLY ONE WELL PRODUCING ON DAY OF TCP TAKE FROM THAT RAW TAP

ENTRY POINT ON GRAPHIC IS COMPLIANCE MONITORING SAMPLE LOCATION (FIRST CUSTOMER)



- If a triggered source water sample is positive for E. coli, the State will require the system to:
 - Collect 5 additional raw water samples from the well(s) within 24 hours of receiving notification of the positive result.
 - If the *E. coli* positive sample is from the combined raw water line prior to treatment, then collect additional raw water samples from each well that was in service at the time the TCR monitoring was conducted.



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Monday, December 14, 2009

ANYTOWN WATERWORKS JOHN SMITH 1905 VIRUS WAY ANYTOWN, AR 72990

RE: GWR Triggered Monitoring

Dear: JOHN SMITH

PWS# 999

Example Report: Triggered Raw Sample - E. coli + Result Requires Collection of Additional Raw Samples

Your system or a public water system which purchases water from you has had either a total coliform positive result on one or more of the routine monthly distribution system samples collected for compliance with the TCR, or your system has had an E. coli positive raw water sample (see results below).

The **Ground Water Rule** requires that you collect at least one raw water sample either on the combined raw water line prior to treatment at each water treatment plant or from each of your well(s) that were in operation on the date the TCR compliance sample(s) was collected. This notice approves you to monitor at either location. Additionally, if source sample(s) are E. coli positive, additional source monitoring will be required.

BOTTLE(S) ARE BEING SENT TO YOU FOR GROUNDWATER SOURCE SAMPLING

System Name:	ANYT	OWN WAT	ERWO	RKS								
Lab No. S	lte.	Site Addre	88				County	Collecte	d Time	Received	Time	Collected By
1014948 99	901	WHS#1 (DOWN	TOWN)			ARKA	1209200	9 0845	12102009	0752	J SMITH
Specimen code	WEL	Purpose	RWE	Category PU	JΒ	Relection	Result:	P EP	TOTAL CO	OLIFORMS	Present Present	
Comments: Actions to Tak	san coli mo	nple. If one lect at least : ne wells are	well is r 3 sampi represe	epresented by es from each on ted collect at	this well leas	s sample, collect	5 additiona s are repres n each well.	al raw water sented colli	r samples fr ect at least	oring at each rom that well; 2 samples fr	well <u>repre</u> if 2 wells a om each w	esidual: 0.0 isented by this irepresented rell; and if 5 or

Select the Site Code and Sample Location from the list of your treatment plant(s) and well(s) below: Enter in the "Site Code" box and "Definite Location of Sample" box on the bacti report form exactiv as shown.

	Site Code	Location		Site Code	Location
WTP:	99901	WTP #1 (DOWNTOWN)	WELL:	A999101	WELL #10A
WTP:			WELL:	A999102	WELL #11
WTP:			WELL:	A999103	WELL #12A
WTP:			WELL:	A999104	WELL #15
WTP:	99902	WTP #2 (MT HOLLY)	WELL:	A999201	WELL #17
WTP:			WELL:	A999202	WELL #18
WTP:			WELL:	A999203	WELL #19
WTP:			WELL:	A999204	WELL #20
WTP:	99903	WTP #3 (MORNING STAR)	WELL:	A999301	WELL #16 MORNIIG STAR



1

- If a system has one well, 5 raw samples are required
- 2 wells 3 samples each
- 3 or 4 wells 2 samples each
- 5 wells or more 1 sample each



BACTERIOLOGICAL FORM

	EPARTMENT O aboratory, 201 s 72205-5425					WATER ANALYSIS-BACTERIOLOGICAL
LABORATO	RY USE ONL	Y	Sample Shipped Via		aboratory Number	Date and Time Received (Laboratory Use Only)
DO NOT IN THIS S	WRITE		(Laboratory Use Only) (La	iboratory Use Only)	
	SECTION 1	Date	and Time Sample	Collected (Re	equired)	SECTION 4 - Sample Type
MONTH	DAY	YEAR	HOUR	(Must Check	Box)	☐ Public Community ☐ Non-community ☐ Semi-Public
			Exact Time	AM [PM	Private - \$17 Fee REQUIRED
SECTI	ON 2 – Publi	. Non	-Community and S	Semi-Public Sy	stem Use Only	
Water System		•	Water System ID Nu		Site Code	SECTION 5 – Source
				(,	Xxx101	⊠ Well
						SECTION 6 – Purpose
Definite Location			City	County	Collected By:	☐ Boil Order ☐ Special/Investigation ☐ New Construction
	Well 1					Raw Water Raw Water with Count
	ECTION 2)	Culturalitters ADII	l anal Haalth	Unite Only	Regular Distribution Sample
_		rivate	Submitters, ADH,		Units Only	Resample Type: Repeat Original Lab #
Definite Location	on or Sample			Collected By:		Original Lab # Replacement
						Required
City	County		Note:			Chloring Decidual (circle and) Free or Total
			\$17.00 Fee Per S	ample 🔲 Credi	t on File, No Fee Included	Chlorine Residual (circle one) Free or Total
Send Report T	o:		'			ENVIRONMENTAL HEALTH SPECIALIST ONLY
	Name					Swim Beach Investigation
	Address					LABORATORY USE ONLY
						Rejection/Disclaimer Code Initials
HL-01 (R 04/17)	City/State/Zip					Analyst Notes:
HL-U1 (R U4/1/)						

- Correct information on forms is important to receive credit for collecting the raw sample
- These are issues experienced by our Staff:
- Incorrect site code correct sites are at the bottom of your notice
- Incorrect "Definite Location of Sample" listed at bottom of your notice
- "Collected by" not filled in
- Failing to include "Original Lab Number"



PUBLIC WATER SYSTEM - BACTERIOLOGICAL MONITORING RECORD

Arkansas Department of Health / Engineering Section

 PUBLIC WATER SYSTEM NAME
 AnyTown Waterworks
 PWS ID #

 MONTH
 December
 YEAR
 2009
 COUNTY

DATE	SAMPLE SITE#	TYPE REGULAR OR RESAMPLE	CL2 RESIDUAL (MG/L)	LAB RESULTS	LAB#	ORIGINAL LAB# (Of Triggering Sample)	DAY/DATE RESULTS RECEIVED
12/1/2009	999B007	regular	0.5		1014304		12/4/2009
12/1/2009	999B006	regular	0.5		1014305		12/4/2009
12/1/2009	999B003	regular	0.5	Α	1014306		12/4/2009
12/4/2009	999B007	regular		P/ EA	1014307		12/6/2009
12/4/2009	999B003	regular	0.5	Α	1014308		12/6/2009
12/10/2009	999B005	Resample	0.5		1014859	1014307	12/9/2009
12/10/2009	999B007	Resample	0.5		1014860	1014307	12/9/2009
12/10/2009	999B007	Resample	0.5	Α	1014861	1014307	12/9/2009
12/10/2009	99901	Triggered		Α	1014862	1014307	12/9/2009
12/10/2009	99902	Triggered	0	Α	1014863	1014307	12/9/2009
12/15/2009	999B007	regular	0.5		2034667		12/22/2009
12/16/2009	999B003	regular	0.5	Α	2034668		12/22/2009
12/17/2009	999B005	regular	0.5		2034669		12/22/2009
12/18/2009	999B004	regular	0.5		2034670		12/22/2009
12/19/2009	999B001	regular	0.5	P/EA	2034671		12/22/2009
12/23/2009	999B007	Resample	0.5	Α	3351332	2034671	12/26/2009
12/23/2009	999B001	Resample	0.5		3351333	2034671	12/26/2009
12/23/2009	999B002	Resample	0.5	Α	3351334	2034671	12/26/2009
12/23/2009	999B003	Resample	0.5		3351335	2034671	12/26/2009
12/23/2009	99901	Triggered	0.5	Α	3351336	2034671	12/26/2009
12/23/2009	99902	Triggered	0.5	P/EP	3351337	2034671	12/26/2009
12/27/2009	999201	Additional	0.5			3351337	12/30/2009
12/27/2009	999201	Additional	0.5	Α		3351337	12/30/2009
12/27/2009	999201	Additional	0.5			3351337	12/30/2009
12/27/2009	999202	Additional	0.5			3351337	12/30/2009
12/27/2009	999202	Additional	0.5			3351337	12/30/2009
12/27/2009	999202	Additional	0.5	Α		3351337	12/30/2009

I certify that the information in this report is true and accurate to the best of my knowledge. I acknowledge knowingly false or misleading information may be punishable under 18 USC 1001 and other applicable later than the control of the control

Printed Name Signature

Put any notes or comments on reverse side; make a copy for your records & return to address on reverse side.



- E. coli positive result from source water sampling, provide Tier 1 Public Notice within 24 hours of notification.
 - Applies to wholesale and purchase Media broadcasting, hand delivery, public locations, official websites
- E. coli positive, collect additional samples or take corrective action.
 - Samples must be collected within 24 hours of notification.
- If the resample E. coli pos PWS MUST take corrective action. (consult w/ State w/in 30 days)



COMPLIANCE MONITORING Treatment for 4-Log Viral Removal/Inactivation

- Although considered a "corrective action", treatment and documentation of treatment to 4-log viral removal/inactivation is an option that will avoid the requirement to sample source water in the event of a total coliform result from RTCR monitoring.
- However, if this option is chosen by the water system or required by the state, then any failure to adequately treat, monitor, or document adequate treatment can result in a treatment technique violation and required public notice.



COMPLIANCE MONITORING

Treatment for 4-Log Viral Removal/Inactivation

Monitoring requirements

- > 3,300 pop. monitor continuously
- ≤ 3,300 pop. monitor daily
- State assigned residual disinfection concentration
- State approved location



COMPLIANCE MONITORING

- > 3,300 people served
 - Continuously monitor residual disinfectant concentration and record its lowest reading each day
 - If equipment fails: grab samples every 4 hours until return to service
 - System must resume continuous monitoring within 14 days (repair or replace continuous monitor)



COMPLIANCE MONITORING

≤ 3,300 people served

- Collect grab sample during the hour of peak flow or other statespecified time each operating day
- If daily grab sample falls below the specified minimum residual, follow-up samples must be taken every 4 hours until the residual is returned to the state-determined minimum level.
- May monitor and record continuously record lowest reading



	Previous Met	er Reading			Temp	erature	_	bs. Che	mical Use	ed (List C	themicals)		pН		Т	URBIDIT	Y	OD	OD	AL	KALINIT	TY	HARDI		0	Entry p	oint to	GWR	CT		FILTE	R OPER	ATION
D			Hours		Fo	or C								μн			(NTU)		OD	Un		(ppm)		(ppr	m)	(mdd)	distrib	ution em	GWR CT	CT Compliance Met?		:D) (s)	
Ā	Master Meter		Plant	(m)							ll			ъ	8		D.	be		þ		D	þe		d	- e	CI2 (Conditions within limits	Met 3	ED CH	SE SE	発売所	WASH WATER USED
Т	Reading	Total Treated x1000 gal	Run	Rainfall (in)	Alr	Water					ll		Raw	Setted	Finished	Raw	Settled	Finished	Raw	Finished	Raw	Settled	Finished	H Se	Settled	Ruoride	Residua	i (mg/1)	below?	8	ŽΣ	HOURS	WASHED RLTER NUMBER(s)	x1000 gal
E	(gal)	_		Ba										S	H		0)	Œ		Œ		w)	Н		o		AM	PM	Y / N	Y / N		0	z	
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1	Maximum																										0.4							
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COMMENTS:			

Minimum Temp >=14 C Plant/Well Flow ⇒ 2000 gpm High Service Flow =<3800 gpm Clearwell Depth >=7 FT

Printed Name	Position:		License #
Signature		Date	
knowingly false	or misleading information may be punishable under 18 USC 1001 a	and other applicable laws.	
certify that the	information in this report is true and accurate to the best of my know	wiedge. I acknowledge that any	

Make a copy for your records & return by the 10th of the following month to the above address.



Samplir	ng Point	GWR	СТ
	ectant al (mg/l)	Flow rate, pH and Temp. within limits?	CT Compliance Met?
AM	PM	Y/N	Y/N
0.4		Υ	YES



PUBLIC WATER SYSTEM - CHEMICAL TREATMENT RECORD Arkansas Department of Health - Engineering Section

Public	Wat	er System Na	me & Er	ntry Poi	nt		ID#		County	Month	Year
Previous Met	ter R	eading		С	hemica	ls Appli	ed		Disinfect	tant Residual 8	CT
			Chle	orine					Sample Location	Flow rate(s), pH	GWR
Master Meter Reading (gal)	Date	Thousands of Gallons Treated	Pounds Used	mg/L	Pounds Used	mg/L	Pounds Used	mg/L	Residual (mg/l)	and Temperature within limits below?	CT Compliand Met?
	1										
	2										
	4										
	5										
	6										
	7										
	8 9										
	10										
	11										
1	12										
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ASSESSMENT MONITORING

• If directed by the State, GWSs shall conduct Assessment monitoring.

 Assessment monitoring generally consists of monthly source samples for a period of 12 months.

Required for all new wells.



SANITARY SURVEYS

- Every 3 years for groundwater systems; 2 years for surface systems
- Evaluate the elements
 - Source
 - Treatment
 - Distribution system
 - Finished water storage
 - Pumps, pump facilities, and controls
 - Monitoring, reporting, and data verification
 - System management & operation
- Identify significant deficiencies
 - Requires special notice to the public
 - Including fecal contamination of source water



GWR Violations – Tier 1

• E. coli positive result from source water sampling, provide Tier 1 Public Notice within 24 hours of notification.

Applies to wholesale and purchase Media broadcasting, hand delivery, public locations, official websites



GWR Violations – Tier 2

Treatment Technique Violations -- Public Notice

- GWS that does not maintain 4 log virus removal at or before the first customer.
- Significant deficiency found during sanitary survey is not corrected w/in 120 days, interim measures not met or schedule not followed.
- Failure to consult w/ State w/in 30 days of notification.
- Corrective Action Plan (CAP) not completed w/in 120 days, interim measures not met or schedule not followed after fecal indicator + source sample(s)



GWR Violations – Tier 3

- Monitoring Violations -- Public Notice
 - Failure to conduct triggered source water monitoring or to demonstrate compliance w/ 4-log virus inactivation by monitoring and reporting. (failure to submit operations reports)
 - Failure to conduct source water *E. Coli* monitoring. Failure to notify other PWS of TCP trigger or *E. Coli* source.
 - Positive source water sample Tier 1 Public Notice required w/in 24 hours.
 - Failure to conduct source assessment monitoring for new sources.



Corrective Action Plan

• If a significant deficiency is identified during the sanitary survey.

• E. coli detected in the source water or repeat samples.



Corrective Action Plan

- Corrective actions include:
 - Correct all significant deficiencies
 - Provide alternate source of water
 - Eliminate source of contamination
 - 4-log inactivation and/or removal of viruses





Corrective Action Plan

 System has 30 days to consult with State and devise an appropriate plan. State may have specific plan and schedule to follow.

 Corrective Action must take place within 120 days, or be in compliance, with state approved corrective action plan.









UNDERSTANDING CT

- Federal regulations contain values for minimum chlorine contact time with drinking water to ensure that 4-log viral removal/inactivation has occurred.
- This is called "CT", "chlorine contact time".
- The state will evaluate well water disinfection applications and award the "contact time" that can be used in calculating CT
- These issues are relevant for systems that using treatment for 4-log viral removal/inactivation as a way of complying with the GWR.



UNDERSTANDING CT

Calculating CT

 $CT = C \times T$

C = concentration of disinfectant residual (mg/L)

- For systems using chlorine, C can be measured with: portable or continuous monitor using an EPA-approved method.
- C must be measured before or at first customer.

T = contact time (minutes)

- between point of application of disinfectant & point where disinfectant residual is measured usually entry point to system
- Based on system components volume of water from application point to entry point

Calculation:

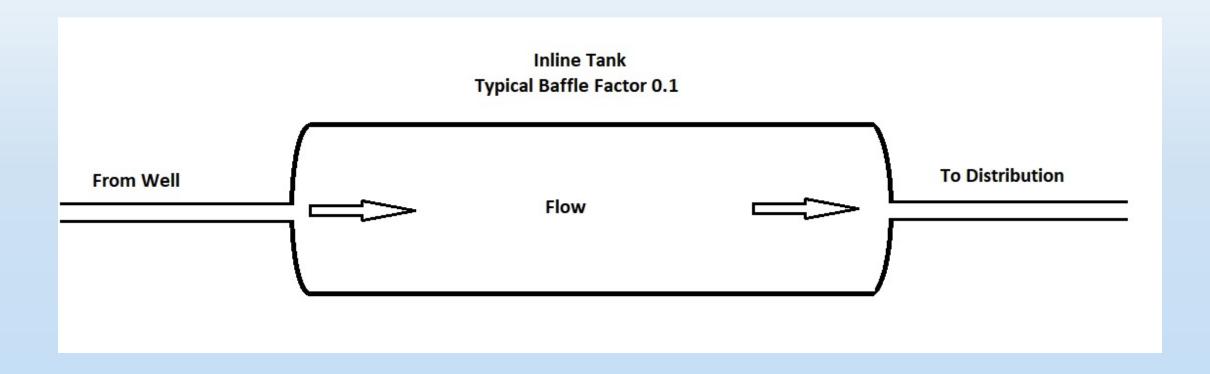
capacity (gal) of system component (pipe, storage tank) system flow (gpm)

CT is expressed as (min-mg/l)

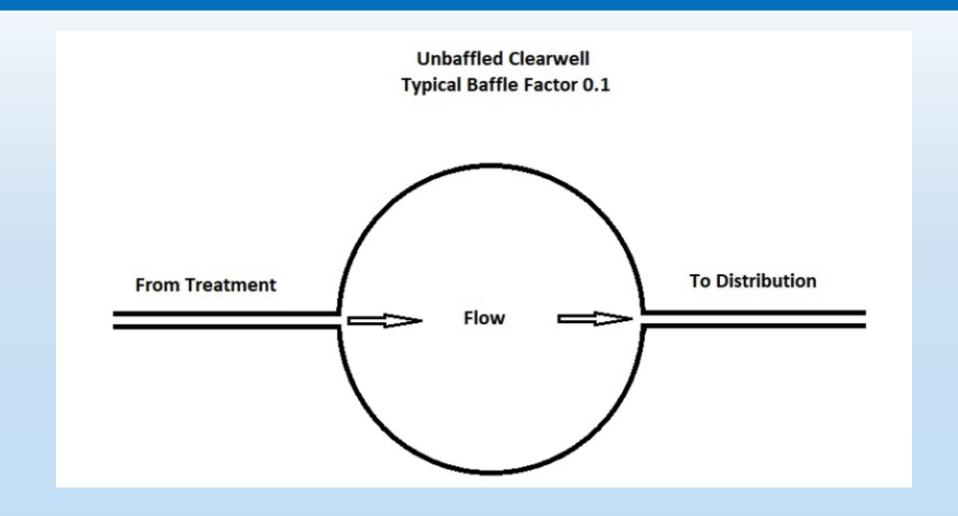


- Baffle factors in clear wells add "credit" to your CT.
- Baffles force the flow of water to utilize more of the tank or basin volume thus increasing CT.
- Must be an applicable baffle factor.
- The next 3 slides show types of tanks than are commonly used with ground water systems and shows the beneficial effect of baffles.

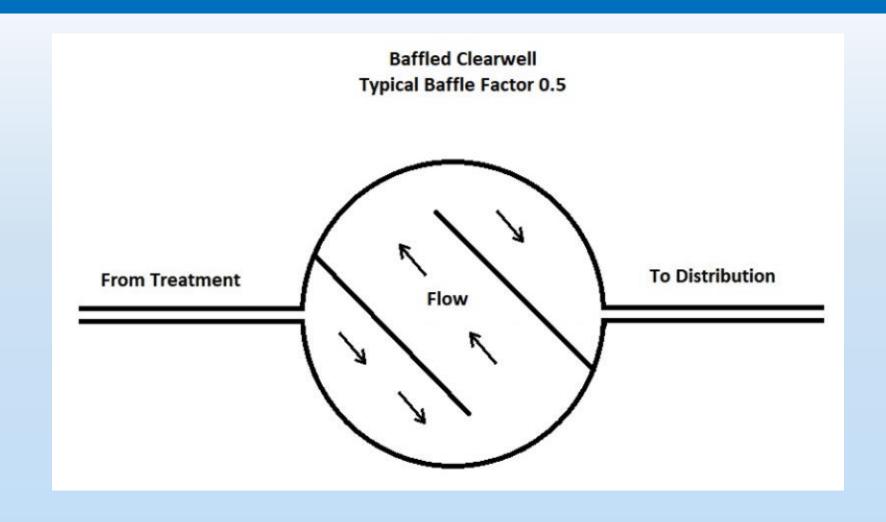














Required CT Values

CT VALUES* FOR 4- LOG INACTIVATION OF VIRUSES BY FREE CHLORINE

	pH	
Temperature (°C)	6-9	<u>10</u>
0.5	12	90
5	8	60
10	6	45
15	4	30
20	3	22
25	2	15

^{*}Although units did not appear in the original tables, units are min-mg/L.



RECORDKEEPING

- Documentation of corrective actions 10 years.
- Documentation of public notice 3 years.
- Records of minimum residual 10 years.
- Record of lowest residual and date and duration of any failure to maintain min residual for a period of more than 4 hours- 5 years.



Who is affected by the Ground Water Rule (GWR)

- A All systems
- B Ground water systems
- C Small Systems
- D Large systems



B Ground water systems only



What is purpose of GWR?

- A Annoy water operators with additional sampling requirements
- B Give the lab more work
- C Provide an additional barrier against pathogens



C – Provide an additional barrier against pathogens



How is Compliance Monitoring conducted?

- A Continuous monitoring of disinfectant residual
- **B** Grab samples of disinfectant residual
- C Only conducted by systems >3300
- D Only conducted by systems <3300



A – Continuous monitoring of disinfectant residual

AND

B – Grab samples of disinfectant residual



When will a triggered (raw) sample be required?

- A Every month
- B Once a year
- C When a routine RTCR sample results in a total coliform positive



• C – When a routine RTCR sample results in a total coliform positive



How many samples are required for a triggered sample?

- A Depends on the number of wells in use that day
- B One sample per well
- C 5 samples per well



A – Depends on the number of wells in use that day

The other answers are somewhat correct but A is the best answer



• E. coli is identified in the triggered sample. How many samples are required?

- A Depends on the number of well in use that day
- **B None**
- C 5 samples per well



A – Depends on the number of well in use that day

C - Is correct if the system has only one well



Questions?

- Questions or Comments?
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