

SBAR Revised Total Coliform Rule

Situation

Effective April 1, 2016 the Missouri Department of Natural Resources (DNR), Missouri's primacy agency for ensuring the safety of public water systems (PWSs), will implement the Revised Total Coliform Rule (RTCR) in conjunction with the Environmental Protection Agency (EPA). This rule will result in significant changes to the manner in which DNR regulates PWSs and the ripple effects from these changes will widely affect facilities regulated by the Department of Health and Senior Services' Bureau of Environmental Health Services (DHSS/BEHS) and Local Public Health Agencies (LPHAs), including lodging, childcare, retail food, and food manufacturing operations. More information on the rule and adoption by DNR can be found at: <http://dnr.mo.gov/env/wpp/rules/wpp-rule-dev.htm>.

Background

Since it became effective in 1990, the state has been operating under the Total Coliform Rule (TCR), a National Primary Drinking Water Regulation. The rule set both a health goal (Maximum Contaminant Level Goal (MCLG)) and legal limits (Maximum Contaminant Levels (MCLs)) for the presence of total coliforms in drinking water. Total coliforms are bacteria that are naturally found in the environment and are tested as an indicator of other pathogenic organisms. The MCLG for total coliform under this rule was zero, and the presence of total coliform required public health protective actions such as a limited use or boil order. DHSS and the LPHAs followed this guidance not only for regulated facilities on PWSs (usually non-community water systems) but extended these policies for facilities served by private water systems. The RTCR diverges from the old rule and determines that coliform is not, in and of itself, a health hazard unless further analysis finds the presence of *E.coli*. Consequently, EPA has removed Total Coliform as a MCL violation and requires PWSs that have an indication of coliform contamination in the distribution system to assess the system for sanitary defects and take corrective action to correct them. *E.coli* continues to have an MCL, as it is indicative of specific contamination from bacteria originating from a human or animal intestinal system and its presence in the potable water of a regulated facility will continue to require health protective measures.

Assessment

DHSS concurs with the science that total coliform is largely an indicator of system sanitary defects, both for PWSs and for private water systems. As such, adopting a strategy in line with the RTCR for regulated facilities to identify and correct system defects will over time provide for maximum public health protection. However, on rare occasions with extenuating circumstances (such as the system is providing water for highly susceptible populations) DHSS will continue to pursue a policy that couples immediate health protective measures with long term assessment and correction of system sanitary defects to ensure the protection of public health.

Recommendation

The RTCR provisions affecting DHSS/BEHS and LPHA regulated facilities on PWSs should be adopted, and to maintain consistency these policy and procedure changes should also be extended to regulated facilities served by private water systems. Specifically, the finding of total coliform in a water sample from a regulated facility (public or private) should result, not in the issuance of a boil order, but in a water system assessment with appropriate actions taken following to correct the sanitary defect (i.e. unsealed well cap, dead end water line, corroded and leaking pressure tank, pitted well casing, etc.) and thereby provide for the long-term and continuous provision of satisfactory potable water.

DHSS should work with DNR to implement these changes in a collaborative manner, and to the fullest extent possible adopt similar water system assessment tools (i.e. forms and surveys), delineate roles and responsibilities on areas of overlap (i.e. regulated facilities served by non—community water systems), and determine time frames and cooperative functions on enforcement actions.

DHSS and LPHAs should be in full agreement on the implementation of these changes, and engage through the various LPHA advisory committees or through a joint workgroup as may be needed to reach agreement on policies and procedures. As the science supports the RTCR DHSS will not be able to support any LPHAs who determine, under local ordinance authorities, to take a course of action conforming to the old rule. That is, continuing to require retail food establishments, in the absence of extenuating conditions, to implement boil orders upon the presence of total coliform.

DHSS, based on the guidance and feedback provided through engaging DNR and the LPHAs, should provide updated policies and procedures in the Environmental Health Operational Guidelines conforming to the RTCR. In addition, develop and distribute water system assessment forms to LPHAs statewide, and develop and provide in-person training at District in-services covering the policy changes, the well system assessment forms, and technical information necessary to provide LPHA environmental health staff with the knowledge to properly assess water systems for sanitary defects.