Determining Source Protection Status Under the Revised Total Coliform Rule (RTCR)

Maine CDC Drinking Water Program • 11 SHS Augusta, ME 04330 • 287-2070 • www.medwp.com

Please Note: The determination process outlined in this document does not apply to surface water systems or those sources that have been deemed to be groundwater-under-the-influence (GUI).

Determining whether a public water system has a “protected source” is important under the Revised Total Coliform Rule, as it can impact whether some water systems are eligible for reduced monitoring of Total Coliform bacteria. Similarly, for water systems that have a default monitoring frequency of quarterly for Total Coliform but have been increased to monthly due to a compliance trigger, source protection status is important for determining eligibility to return to a quarterly monitoring frequency.

The following two criteria must be met in order for a public water system to have what is considered a “protected source” under the Revised Total Coliform Rule (RTCR):

➢ Criterion 1: Have ONE of the following:
  • An active and up-to-date source water protection plan; or
  • Own their entire source protection area; or
  • Have a legal ordinance in place which protects their source protection area

AND

➢ Criterion 2: Meet the following condition:
  • No microbiological Potential Sources of Contamination (PSCs) within 300ft of the source* (examples include leachfields, manure piles and spreading, organic waste, etc.).**

  ◆ *If a 300 ft. separation does not exist, the public water system has the option of hiring a Maine certified geologist to conduct a hydrogeological investigation to demonstrate that the water quality will not be hydrogeologically impacted by the microbiological PSC. DWP’s Hydrogeologist will then need to review this report and agree with the finding in order to identify the source as being “protected.”

  ◆ **A list of microbiological PSCs can be found on page 3 of this document.

1. What is an active and up-to-date source water protection plan? An active and up-to-date source water protection plan is a current plan, ‘actively’ being used and implemented by a public water system and should include a description of the water system, an inventory of PSCs within their source protection area, an assessment of risks posed by these PSCs, and a plan to minimize these risks to their drinking water source. A plan should be a working document that is reviewed at least annually and updated every three years to remain current, active, and viable. The Drinking Water Program has a Do-It-Yourself Wellhead Protection Plan Template designed for small systems to be able to create their own wellhead protection plans. The template and accompanying instructions can be found on the DWP’s webpage by going to www.medwp.com, clicking on the “Public Water Systems,” link and then on the “Source Water Protection” link.
Flow Chart for Determining if a PWS has a “Protected Source”

1. Does PWS have an active and up-to-date source water protection plan?
   - Yes
   - No

2. Does PWS own its entire source protection area?
   - Yes
   - No

3. Does PWS have any microbiological potential sources of contamination (PSCs) within 300ft of its source?
   - Yes
   - No

   **PWS has the option to hire a certified geologist to conduct a Hydrogeological Study to demonstrate that the well will not be impacted by the microbiological PSC(s) present. The report must then be submitted to, and approved by, the DWP Hydrogeologist.**

4. Is there an ordinance or other legal restriction in place to protect source of the PWS?
   - Yes
   - No

5. Does PWS have an approved Hydrogeological Study indicating that the well will not be impacted by any microbiological PSCs present?
   - Yes
   - No

**PWS does not have a protected source.**
<table>
<thead>
<tr>
<th>Examples of Microbiological Potential Sources of Contamination (PSCs)</th>
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<tbody>
<tr>
<td>Septic systems, leachfields and waste disposal activities, including handling or storage of commercial, industrial, residential and municipal wastewater and/or sludge; wastewater transmission lines and wastewater treatment plants.</td>
</tr>
<tr>
<td>Graveyards and cemeteries including large scale animal burial sites.</td>
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<tr>
<td>Food processing facilities.</td>
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<tr>
<td>Agricultural activities including fertilized crops, animal grazing, feeding, manure piles, manure or sludge spreading, meat packing, and slaughter houses.</td>
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<tr>
<td>Nursery or garden shops utilizing fertilizer applications.</td>
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<tr>
<td>Landfills, dumps, transfer stations and other storage of trash and/or salvage materials.</td>
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<td>Parking lots (depending on site-specific conditions).</td>
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<tr>
<td>Storm water impoundments and runoff areas.</td>
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<tr>
<td>Mining activities (depending on site-specific conditions).</td>
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<td>Improperly abandoned wells.</td>
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<td>Snow dumps (large commercial or municipal).</td>
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</tbody>
</table>

**Note:** Perennial surface water bodies (lakes, ponds, streams, rivers, etc.) are NOT considered to be microbiological potential sources of contamination within this RTCR source protection determination.

This list is not meant to serve as an inclusive list of all PSCs that are classified as “microbiological” under the RTCR determination of a protected source, but rather as an example of common PSCs that can generally be considered microbiological. Additionally, the DWP reserves the right to use its own professional judgement and discretion to make decisions on which activities, facilities, structures, and land uses found within 300 ft of a public water system well are deemed to be a potential source of microbiological contamination.