

GWR/TCR Sample Overlap

Ground Water Rule (GWR) Triggered Source Samples and Total Coliform Rule (TCR) Repeat Samples

All systems are encouraged to collect an additional/separate raw water/source sample to comply with the GWR.

Part I: The Rule - How the rules work and the number of samples required for small systems (<1,001 people).

The Summary

Systems who...

1) Who have a positive routine TCR sample

AND

2) Do not have any treatment

...may collect their 4th TCR Repeat sample from the source and have it count for both the TCR and GWR sample requirements.

HOWEVER, additional source samples are still required if the system has more than one source.

The Explanation

The TCR and the GWR run parallel but are separate rules with separate requirements.

Most of you are familiar with the TCR and understand that when a system has a positive total coliform routine sample it is required to take repeat samples within 24 hours. The number or repeat samples is dependent on the number of routine samples collected that month.

In an effort to minimize the cost to small systems the GWR and TCR rule will allow one of the repeat samples under the TCR to be collected from the source and count for one of the source samples required under the GWR after a positive TCR sample is collected in the distribution system.

The GWR requires a source sample from every active source (well, spring, etc.) in operation at the time any positive regular routine TCR sample is collected (NOTE: temporary routine TCR samples do not trigger the GWR).

**Samples for the TCR must be representative
of conditions throughout the distribution system.**

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Part II: Labeling - How the GWRsource-TCRrepeat samples should be labeled for submittal so DEQ PWS can count it towards both rules.

The Summary

Any sample that is submitted for compliance purposes for both the GWR and TCR must have the following information associated with it for DEQ PWS to count it for both rules:

- 1) The original routine TCR sample number and collection date
- 2) RP (Repeat) for the sample type
- 3) Raw Water or RW on the sample name or sample comments
- 4) The water system facility identification code (e.g. WL002) or the name of the source facility (e.g. Well 1-North Well) and the sampling point (e.g. RW002)

Lab to State template requirements will be as follows:

1. Original Sample Information
 - a. TCRsample Worksheet, Column W “OrigLabSampNo”
 - b. TCRsample Worksheet, Column X “OrigCollDt”
 - c. TCRsample Worksheet, Column Y “OrigLabCertID”
 - d. TCRsample Worksheet, Column Z “OrigLabCertAgency”
2. Sample Type (should always be repeat “RP”)
 - a. TCRsample Worksheet, Column N “SampType”
3. Water System Facility Code and Sample Point Code
 - a. TCRsample Worksheet, Column G “WsfID”
 - b. TCRsample Worksheet, Column H “SampPt”
4. Sample Description (ex. Raw Water or Source Sample)
 - a. TCRsample Worksheet, Column AA “SampComment”

The Explanation

The one sample that will be applied to both the TCR and the GWR will have to meet the requirements of the TCR rule first. DEQ PWS is expecting repeat samples to look basically the same as usual. The two things the laboratories need to add to the GWRsource/TCRrepeat sample are the water system facility code (or name) and the words Raw Water or the letters RW in the sample name so the DEQ GWR manager can see that it was submitted with the expectation that the sample will also count as a triggered source sample under the GWR.

TCR and GWR Sample Overlap

Abbreviations

TCR - Total Coliform Rule
 GWR - Ground Water Rule
 TCR/GWR - Combined

Sample satisfies **only TCR** requirements

Sample satisfies **both TCR and GWR** requirements

Sample satisfies **only GWR** requirements

