



EPA Region 8 Revised Total Coliform Rule and Ground Water Rule Sample Labeling Instructions

These instructions are specific to the **Revised Total Coliform Rule (RTCR)** and the **Ground Water Rule triggered monitoring (TG GWR)** samples ONLY. They do not pertain to samples collected for Nitrates, Chemicals, Lead, Copper or any other contaminants. **ONLY RTCR and TG GWR.**

There are 4 types of samples that may need to be collected under the RTCR and GWR.

1. **Routine**
2. **Repeat**
3. **Special**
4. **Ground Water Rule – Triggered (TG GWR)** – not applicable to surface water systems or those that only purchase water from another system.

On the Chain of Custody (COC) form from your laboratory there should be a space for notes or comments where you can indicate that a sample is **Routine, Repeat, Special** or **Triggered GWR**. Some chain of custodies have all the sample types printed on the form and you can just check the correct box. You can also use the RTCR Lab Sample Form at <https://www.epa.gov/region8-waterops/revised-total-coliform-rule-lab-sampling-form> and the GWR triggered source reporting form at <https://www.epa.gov/region8-waterops/wyoming-and-tribal-triggered-groundwater-source-sampling-form> along with your lab's chain of custody form when you collect your samples to be sure all the correct information is captured.

A **Routine** sample is one that is collected each month and must be received by EPA by the 10th of the following month. If the sample is received after the 10th of the month, the system will receive a reporting violation, even if caused by late reporting of the data by the lab to EPA.

A **Repeat** sample is one that is taken after a system has at least one TC+ or EC+. The system is required to collect 3 repeat samples per each TC+ and/or EC+. Even if the system only has one tap, it is required to collect all three repeat samples successively at that tap and have them analyzed within 24 hours of the routine TC+ or EC+.

A **Special** sample is a non-compliance sample. This sample may be collected by the system to assess how the system is doing after they complete construction work, etc. The sample must be labeled Special (SP) at the time it is submitted to the lab. It cannot be re-labeled SP after the results are reported. Seasonal systems are required to collect "Special" samples as part of their seasonal start-up checklist BEFORE they serve any water to the public.

A **Triggered (TG) Ground Water Rule (GWR)** sample is only collected by groundwater (GW) systems (using their own wells or springs) when a routine RTCR sample is TC+ or EC+. This sample (or samples) must be collected from the source [well(s) or spring(s)], whereas the RTCR samples must be collected from the distribution system. This sampling falls under the Ground Water Rule, but it is triggered by the RTCR, which is why they are collected at the same time as the Repeat RTCR samples. If the system

does not collect the **TG GWR** sample(s) [from the source(s)], they will incur a monitoring violation under the GWR.

The information about the type of sample collected is **required by the EPA**. If you do not include this information on the lab form sent to EPA you may receive a violation, since the sample cannot be recorded correctly in EPA's records. For instance, a Special sample is not used for monthly compliance and if the lab slip indicates a Special sample, then the system may incur a monitoring violation for not collecting a Routine or Repeat sample to be used for compliance.

Surface water systems are not required to collect any samples under the Ground Water Rule when they have a TC+ or EC+.